Wisconsin
Policy
Research
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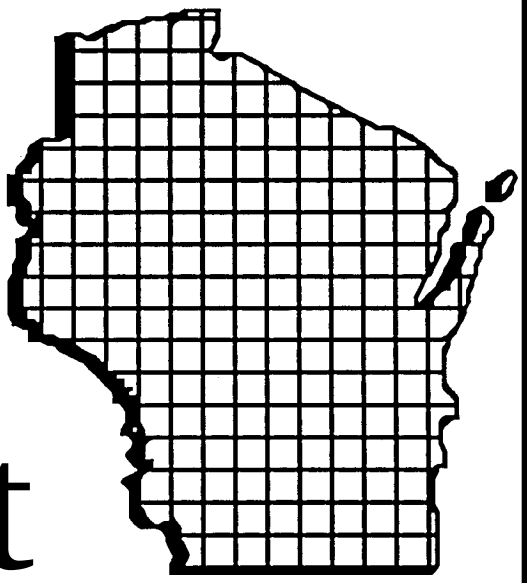
Report



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The Growth of Special Education in Wisconsin

REPORT FROM THE PRESIDENT:

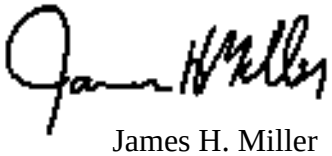
No issue in Wisconsin government has grown faster in the last decade than special education. It has accelerated to a $1 billion per year educational program with little accountability. The growth rates at every level are astonishing. These are the findings of a study we commissioned on this topic by one of the top young educational researchers in this state, Thomas Hruz, a resident fellow of our Institute. Hruz, a lawyer with a graduate degree in public policy from the La Follette School of Public Policy at the University of Wisconsin-Madison, has authored several studies and articles on Wisconsin education over the last five years.

Special education is one of the most complicated public policy issues that we face today. A combination of legal and educational policies determines the decision about who is selected to become a special education student in Wisconsin. The actual process varies wildly across the state. In addition, the local costs are even more startling, ranging from approximately $40,000 per student per year in one district to less than $7000 per student in another district. If a district spends $40,000 on one special education student, it has much less to spend on other students. No one disagrees with the importance of spending extra money on the truly disabled, whether they have mental or physical disabilities or even possible learning disorders. However, current trends demonstrate that the growth today is being accelerated, not by rising numbers of the truly disabled but because of qualitative judgments about who is selected to become a special education student.

This identification process needs careful examination by all concerned government agencies, elected officials and taxpayers throughout Wisconsin. How can, for example, the number of autistic children explode in a four-year period by 145%? While the federal government supplies tremendous over-regulation and very few financial resources, it is at the local level where the real problem occurs. There does not seem to be any standard pattern used by our 426 school districts to determine who should be in special education. It appears that many students are selected for these programs based on a feeling, rather than a quantitative fact.

Then there is the question of racial composition. There is a larger percentage of black students than there are whites students in special education in Wisconsin. In some school districts that ratio is alarming. Percentage-wise, Madison will have twice as many black students as white students in special education. This is a pattern that is also occurring in Kenosha and Racine. Yet in Milwaukee, the largest district in the state, the figures for black students are only slightly higher than those for white students. If black children are truly in need of special education, why is it that the percentages are so much smaller in Milwaukee than in other large districts?

Finally, because of the length and complexity of this report, for the first time in fifteen years we are issuing this study in two formats. The first is an abridged version that will summarize the general findings of the study. The full version of the study will only be available on our website, www.wpri.org.



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THE GROWTH OF SPECIAL EDUCATION IN WISCONSIN

Thomas Hruz

EXECUTIVE SUMMARY

In the 2000-2001 school year, Wisconsin school districts reported spending over one-billion dollars to educate and otherwise serve the state's 125,358 students enrolled in special education. This amount represents an astonishing 69% increase (in current dollars) from what state school districts spent during the 1992-93 school year, a mere eight years earlier. Contributing to this result, a sizable number of the state's school districts spent, on average, over $20,000 on each child in special education during the 2000-01 school year.

To determine whether these special education dollars are being wisely spent, one key question is whether all of the students identified as in need of special education truly require such labeling and the comprehensive, costly special treatment that accompanies it. Addressing this question, this report analyzes the growing concern over the possible misidentification and over-identification of students into special education in Wisconsin.

Special education is one part education and at least two parts a system of bureaucratic and legalistic imperatives, all of which govern what is essentially a public policy decision over which students should be served by a differentiated mode of instruction. The process by which a student becomes placed in special education is immersed in procedural, legal, and administrative requirements. It can be an expensive, time-consuming process that does not yield direct educational results. It also is a process ripe for subjective determinations of special education needs.

The percentage of Wisconsin students identified as in need of special education has increased steadily in the past 25 years, with the rate of increase being significantly higher than that of the nation as a whole. However, across the state there exists a wide disparity among districts in the percentage of each district's students being identified as in need of special education. While the average percentage of students in special education across all 426 districts was about 12% in 2000-01, 88 districts placed over 15% of their students into special education (10 districts placed 20% or more), while others placed as little as 4 to 5%. If one assumes that disabled children in the state are randomly distributed, then one would theorize that the percentage of such students in any one district would be approximately equal. Ideally, a student who is deemed disabled in one district would also be found disabled by another district. The wide disparities suggest, however, that the process of identifying students for special education is far from being uniform and, at a minimum, should be adequately explained by district personnel involved in the decision-making process.

Therefore, there needs to be a greater inspection of how some of the eligibility criteria are used in Wisconsin — ostensibly at least — to determine which students are actually "disabled." Students are placed in special education according to multiple eligibility categories. Some of these categories include students who are unquestionably fit for special education, such as the mentally and physically retarded. Other disabilities are determined by a more questionable "science" as a means for determining eligibility. In particular, these include the terribly subjective categories of "learning disabled" and "emotionally disturbed." A close inspection of the eligibility criteria used for these disabilities shows little objective guidance, and helps explain the following findings:

- Over 55% of all special education students in Wisconsin have "learning disabled" or "emotionally disturbed" as their primary disability, with the majority of those being learning disabled.
- During the period between 1996 and 2001, the increasing number of learning disabled students alone accounted for 53% of the total increase of students in special education. In contrast, the number of students with cognitive disabilities remained constant during that period. This latter result has occurred even though the cognitive disability category, which is largely composed of the mentally retarded, is the primary category to which special education was originally directed.
- Notably wide variation exists across state school districts in the incidence of children labeled as learning or emotional disabled. This variation shows that it is highly doubtful that sound science exists to guide the creation of eligibility criteria for these disabilities.
- The percentage of students found to be learning disabled and emotionally disturbed rises significantly after children reach the age of 12. Why a child is not learning or emotionally disabled when in the third grade, yet becomes disabled by the time he or she is in the eighth grade, is a troubling question. These figures lend credence to criticisms that current state special education policy operates as a "waiting to fail" system.

A startling disparity with special education placements rates by student ethnicity is also occurring. Across the state, and in some districts in particular, certain ethnic minorities are at a much greater risk of being placed in special education. Some within- and between-district comparisons show noteworthy discrepancies. For example:

- The incidence for black students is of special concern. In five of the state's 25 largest school districts (Appleton, Elmbrook, Madison, Oshkosh, and Wisconsin Rapids), black students are found in special education programs at a rate twice that of their white counterparts. Overall, in half of the 25 largest districts for which data are available, a black student is at least 50% more likely than is a white student to be placed in special education.
- Eighteen percent of black students in the Milwaukee Public Schools (MPS) are identified as in need of special education, compared to 31.6% of black students in Madison. Therefore, a black child in Madison is 70% more likely than one in Milwaukee to find himself or herself placed in special education. (Madison is not the only district more likely than MPS to place black students in special education.)

Many factors help to possibly explain these results, including improper bias, underlying social conditions, considerations of cost, and benign variations in judgment and procedure, but which still require a significant reevaluation of district polices on identifying students for special education. All of the factors need to be identified and examined if Wisconsin's educators wish to ensure that they are properly serving all students, regardless of race.

The over-identification of children into special education is a serious concern for academic, social, and fiscal reasons. Improper placement of students into special education is problematic when it stigmatizes students, separates them from their peers, results in lower academic expectations, generates undesirable educational outcomes, or causes any other adverse effects. The data are clear that students in special education in Wisconsin are, on average, suspended more often, graduate at a lower rate, achieve less success as adults, and score lower on statewide academic assessments. Furthermore, students placed in special education are unlikely to exit special education—districts average reevaluating students back into special education at a rate of 82%. To be sure, the negative correlations are not inherently the fault of the state's special education system, as students properly placed in special education programs are afflicted with disabilities that would tend to lead toward these results. The primary concern is with students truly on the margin, who may otherwise be adequately taught and educated without formal placement in the state's special education system.

Beyond the educational effects of over-identification, there are also the immense direct costs and lost opportunity costs that accompany the placement of students into special education. Students placed in special education require, on average, more than twice as much money per-pupil to educate as regular students. Of course, the amount spent on any individual special education student varies considerably between low-incidence, high-costs students (the severely retarded) and high-incidence, low-costs students (most learning disabled students). Yet if some students within that latter category are being misidentified for special education and, therefore, could be just as effectively taught under the methods of regular education, their education could be achieved at a dramatically lower cost. Wisconsin and its school districts must avoid erroneously allocating special education funds for students not truly in need of formal special education programs. Over-identification leads to one of two results: either 1) special education funds remain at the levels they are currently, and students who are not truly disabled will draw away funds that would otherwise go to help truly disabled students in special education, or 2) the state and local districts will spend even more money on these programs by either raising tax rates or reallocating funds that would otherwise serve the regular schooling of students who are not listed as disabled. To avoid these negative results, a funding mechanism for special education must be established to create a disincentive to over-identify students in special education.

Special education began as a policy to aid in the education of students with severe disabilities that inhibited their ability to learn effectively in regular education settings. This understanding — that special education is directed at the mentally and physically handicapped — is still maintained today to some extent, but it has lost its focus. As special education comes to serve a larger percentage of students, it is clear that students who are on the margins of fitting the classical image of a truly mentally or physically disabled student are nonetheless being placed in special education. This development is undesirable.

INTRODUCTION

In the 2000-2001 school year, Wisconsin school districts reported spending over one-billion dollars to educate and otherwise serve the state's 125,358 students in special education. Some of this cost was covered by equalization aid from the State of Wisconsin to school districts and by the $315,681,400 the state allocated for special education categorical aid. Given the latter expenditure, special education is, by a comfortable margin, the most expensive categorical aid education program in Wisconsin. In addition, the federal government allocated to Wisconsin over $78,000,000 in general aid and approximately $8,000,00 in specific grants for special education purposes. Meanwhile, the portion of special education costs not covered by either state or federal aid was spent from the general education budgets of individual districts. In sum, special education accounts for an enormous part of the public education budget at both the state and local level.

With healthy and growing levels of funding comes, as it should, the attention of a great many educators, politicians, public interest groups, and taxpayers as to whether special education dollars are being wisely spent and, if they are not being efficiently used, how that may be accomplished. A central issue is whether all of the students identified as in need of special education truly need such labeling and the comprehensive, costly special treatment that accompanies it, or whether portions of the state's special education students could be just as effectively taught under the methods of regular education but at a dramatically lower cost. The latter option may demand that certain accommodations be made for some students, but it would keep those students out of the costly and stigmatizing realm of special education. Addressing this issue, this report analyzes the growing concern over the possible misidentification and over-identification of students into special education in Wisconsin.

Special education is one part education and at least two parts a system of bureaucratic and legalistic imperatives, all of which govern what is essentially a public policy decision over which students should be served by a differentiated mode of instruction and what services those children should receive. Therefore, this report begins by outlining the process by which a student becomes placed in special education, highlighting some of the procedural, legal, and administrative aspects that bear on this system.

This report continues this discussion by addressing some specific issues concerning the over-identification of special education students and Wisconsin's ever-growing special education incidence rate. In particular, it inspects the distribution of special education students across the multiple eligibility categories by which children are determined to be disabled and in need of special education. In July of 2001, new eligibility criteria for placing children in special education went into effect in Wisconsin. Many commentators harbor concerns that these new criteria will only continue a growing trend in the increasing percentage of students being placed in special education. This analysis then segues into a thorough inspection of some of the eligibility criteria used in Wisconsin. In particular, the terribly open and subjective categories of "learning disabled" and "emotionally disturbed," which constitute the bulk of Wisconsin special education students, are discussed at length.

Statewide, slightly over 12% of the state's total K-12 student population is classified as in need of special education, and the percentage has been steadily rising. However, across the state there exists a wide disparity among districts in the percentage of each districts' students identified as in need of special education. Throughout this report, extensive across-district comparisons are made using data from all 426 of Wisconsin's school districts.* These comparisons show the large differences across districts in terms of rates of referral to special education, rates of placement in special education, rates of reevaluations resulting in continuing special education, the percentages of students placed according to all the disability groups, and so forth. The wide disparities found across all these measures suggest that the process of identifying students for special education is far from being uniform and, at a minimum, should be adequately explained by district personnel involved in the special education decision-making process.

Moreover, a startling disparity with special education placement rates by student ethnicity occurs in some districts. Across the state, and in some districts in particular, certain ethnic minorities are at a much greater risk of being placed in special education. For example, a black student in the Madison Metropolitan School District and in four other of the state's 25 largest school districts is more than twice as likely as his or her white counterpart to be placed within special education. This finding reflects national trends in the possible over-identification of certain racial

* Although subsets of these data appear throughout the text of the report, data for all districts are available in the appendices.

minorities into special education. If a general occurrence of over-identification is happening in Wisconsin, then these students are particularly being harmed by such improper and unnecessary placement in special education.

Special education in Wisconsin is at a crossroads. While nearly every politician, education bureaucrat, teacher, parent, and other person involved in special education agrees that elements of the state's special education system need serious modifications — whether in terms of financing, program administration, or policy focus — few agree as to the precise contours of these changes. The data and analyses presented throughout this report will help to inform this discussion. Specifically, this report raises concerns over the system by which students, many of whom may not be truly disabled, come to be placed in the costly confines of special education.

Note on Methodology

Most of the data provided throughout this report are from the 2000-01 school year, the most recent year for which complete statewide data are available on special education figures. Unless otherwise noted, the data from which across-district comparisons are made come from the Wisconsin Department of Public Instruction (DPI), 2001-02 Special Education Reports. These reports are submitted annually to the DPI by each school district, outlining district data for the preceding school year (in this case 2000-01) across various metrics.[1] Under state law, each local education agency (most of which are commonly known as school districts) must provide a battery of information on special education within the district.[2] The data that must be provided include prevalence rates by disability, graduation and dropout rates, suspension and expulsion rates, referral rates, special educator staff-to-student ratios, reevaluation rates, and more. These data, which began being collected for the 1998-99 school year, are then reported by the DPI and are available on-line for public dissemination.[3]

In a few measures reported, all of the state's 426 districts are incorporated into the analysis, with only a few of the unconventional facilities at which state special education students are taught being excluded.[4] On most occasions, however, data will be discussed in a limited fashion, with only the state's 100 largest districts in terms of student enrollment being analyzed. Schools within these 100 districts,[5] both public and private, together educate approximately 70% of all the K-12 students in Wisconsin.

Data presented throughout the report are provided for only the top 100 largest districts for three main reasons. First, as just mentioned, these districts enroll a significant portion of the state's total student population. Therefore, to the extent that special education concerns are tied to the overall number of students served (or potentially served), these larger districts involve the greatest impact on state special education policies. Second, the use of only the 100 largest districts omits all K-8 districts (those with students enrolled only in grades Kindergarten through 8) and Union High School (UHS) districts (those with students enrolled only in grades 9 through 12). These districts, because of their limited school populations, often distort figures used for across-district comparisons which would, without an understanding of the actual composition of these districts, lead to inappropriate and relatively meaningless conclusions. The final reason is that some of the smaller districts, even those not K-8 or UHS, often act as outliers when percentages are used for comparison purposes.

BACKGROUND: THE PURPOSE AND PROCESS OF SPECIAL EDUCATION

In order to better comprehend the issues involved with the potential over-identification of students into special education, one must have an understanding of the process and polices behind which decisions are made to identify students. Part of the task of analyzing special education policies is to unmask what that term has been colloquially assumed to mean, what it should mean, and how a more refined and precise definition of the concept can aid education policy. State statutes define "special education" as "specially designed instruction, regardless of where the instruction is conducted . . . ."[6] This circular definition is unhelpful, and perhaps purposely so. In one sense, "special education" is a mere euphemism, suggesting that the pedagogical approaches and participants in such programs embody simply an irregular form of schooling. In this sense, special education encompasses the totality of education matters, including instruction and learning assistance, that are deemed to not fall within the purview of regular education.

However, this understanding is muddled by the fact that there is an intersection between regular education and special education. Special education students are involved in regular education programs and use regular students as

a gauge of progress. Moreover, this intersection is consciously designed and desired by policy makers — a goal known as "inclusion." Educators and parents have expressed a strong desire to include special education students in the regular process of education to the greatest extent possible. This desire is reflected in the laws and policies on special education within Wisconsin. The values of inclusion are important for making all students feel equally a part of the education process. However, with the mixing of disabled and non-disabled students comes the temptation of looking at children on the margins of being labeled disabled (e.g., low-achievers) as being in need of special education when they are not, in fact, truly disabled.

The Genesis of Special Education

While the legal requirements and implementation policies of special education policy currently swim in an ocean of complication, the premise behind special education is surprisingly simple. The notion is that all children, regardless of their disabilities, should receive an education that will enable them to live the fullest and most-complete life practicable. Under special education law, the technical term for this notion is "free and appropriate public education," colloquially known by its acronym, FAPE. It is defined in Wisconsin as "special education and related services that are provided at public expense and under public supervision and direction, meet the standards of department [of public instruction], include an appropriate preschool, elementary or secondary school education and are provided in conformity with an individualized education plan."[7]

Prior to the enactment of major federal legislation in the 1970s, the perception — and to large extent the reality — was that children with mental and physical retardation, who due to their disabilities were less capable of learning through regular methods of schooling, were being inadequately acknowledged by school systems. As a result, a population of students was being poorly educated, if they were being formally schooled at all. Special education laws sought to ameliorate this inequity in the realm of public schooling and to ensure that all children are provided a roughly equal opportunity to learn. This noble goal, however, has generated new mandates and policies, many of them encoded in numerous state and federal laws. Implementation efforts have been marked with varying degrees of success.

Special Education as Applied Through Federal Law

Discussions of special education in Wisconsin invariably involve issues of federal law and policy related to the education of students with disabilities. The impact of federal policy is mostly witnessed in two ways: (1) the legal dictates arising primarily under the Individuals with Disabilities Education Act (IDEA) that impose minimum requirements on the education of children with disabilities; and (2) the funding mechanisms that provide financial support to state special education programs.

Originally enacted in 1976 as the Education for All Handicapped Children Act[8] and significantly amended in 1990 and 1997, the IDEAoperates as the most important set of legal requirements regarding the provision of educational services for disabled students.[9] The primary component of the law is the requirement for the establishment of a free, appropriate public education in the least restrictive environment for all students. Essentially, the law requires that states provide the means by which all children with disabilities will receive a full education as similar as possible to that of regular students. Other extensive provisions of the law and accompanying federal regulations specify the processes and other details for making the basic FAPE requirement complete.

Unfortunately, the federal government fails to be as aggressive in its funding of special education as it is in its legal mandates. The degree of federal financial aid for special education has diminished in the past few decades, both nationally and within Wisconsin. In fact, when the IDEA was first passed, the federal government promised to supply, by 1982, 40% of schools'excess special education costs (those above the normal per-pupil expenditure for that district). In 2000, the federal government only paid about 12% of national special education costs, following a prior change in the IDEA to state that the federal government must pay a "maximum" of the 40% per-pupil costs.[10] One of the primary topics of discussion with Congress's upcoming reauthorization of the IDEA is precisely whether it should begin picking up its share of the cost for special education programs and services. Until any changes are forthcoming, because the minimum standards required under the IDEAare legal mandates that must be achieved regardless of the level of federal aid flowing to support that goal, special education has become the consummate example of an unfunded federal mandate.

Aid under the IDEA for special education programs are provided by "flow-through" funds to school districts on an entitlement basis. Funds may be used for staffing, educational materials and equipment, and other costs to provide special education and related services to children with disabilities, and funds may only be used for special education. These flow-through entitlement funds are distributed to individual districts in accordance with an allocation formula. This formula works by first determining each district's "base amount," which is arrived at by the federal government looking to the previous year's child count for each district. Additional funds are then distributed based 85% on enrollment and 15% on poverty levels. Finally, districts may carry over up to 25% of their previous year's entitlement if excess funds remained from the prior year. Statewide in Wisconsin, $78,379,786 in federal entitlement funds were distributed in the 2000-01 school year, (each district's amount of these funds is listed in Appendix B).

In addition, $7,995,834 in statewide FY2001 discretionary grants from the federal government were spent that school year in the state. These grants were distributed as targeted aid for statewide initiatives aimed at ensuring the greatest impact on the maximum number of children in Wisconsin, and often go to the state's twelve Cooperative Educational Service Agencies (CESAs).

Although these federal aid amounts appear to be large, as a percentage of total special education funding, this aid is relatively small. While Wisconsin spent over $1 billion in aid specifically for special education in 2000-01 the federal government aid for special education in Wisconsin for that year totaled only about $86 million, or about 8% of the state's total special education expenditures.

SPECIAL EDUCATION IN WISCONSIN

Against this backdrop of extensive federal law yet limited federal funding, Wisconsin has adopted its own methods for satisfying the needs of special education students within the state. The federal law operates to establish a minimum level of services that state schools must provide; yet states are permitted to either augment or change special education policies so long as they still meet the requirements of federal law. Moreover, states are able to modify their eligibility criteria for who deserves special education so as to make such definitions more inclusive. Wisconsin, for example, has recently made modifications to its eligibility criteria for disabilities served by special education.

Financial Matters

Special education is financed by a combination of state, local, and federal funding. In the 2000-01 school year, Wisconsin school districts reported to the state Department of Public Instruction having spent a total of $1,063,668,808 on special education and related services that would potentially qualify for state aid. This amount represents an astonishing 69% increase (in current dollars) from the approximately $630,000,000 that state school districts spent during the 1992-93 school year, a mere eight years earlier.[11]

Given that 124,505 students in the state's school districts qualified in some manner for the receipt of special education services,[12] on average, approximately $8,543 was spent statewide per special education student, over and above the per-pupil expenditures otherwise allocated to each district student. When each district's average per-pupil expenditure is added to this figure, approximately $16,299 was spent in the state for each special education student. This amount is more than double the average per-pupil expenditure in the state during 2000-01, which equalled $7,852. Of course, in actuality, the amount spent varies considerably from one special education student to another. Some students require only modest accommodations to fulfill their needs for an appropriate education; therefore, the proper education of these students causes districts to incur relatively minor levels of additional expense to meet those students' FAPE requirements. Other students, however, are "high-cost." These students possess disabilities that are profound and severely debilitating, such that providing them with an appropriate education will require considerable human and financial resources.

The state reimburses portions of the costs of educating and otherwise serving students enrolled in special education. The State of Wisconsin spent over $315,681,400 on special education categorical aid in the 2000-01 school year. Special education categorical aids, which are distributed on a prorated basis to districts, assist with the costs of providing special education and related services. These include reimbursement for the costs of hiring properly licensed staff (including teachers and teacher aides, physical and occupational therapists, speech/language therapists,

special education directors, school psychologists, social workers), special transportation, and other related costs and services.

In addition, "special education costs that are not reimbursed by federal or state categorical aids are eligible for reimbursement under state general equalization aids, and a larger portion of special education costs has been shifted to this funding source over time."[13] Partly due to this concern, the state Joint Legislative Audit Committee in 1999 requested the Wisconsin Legislative Audit Bureau (LAB) to conduct a thorough analysis of special education cost data. The LAB inspected the growing costs of special education (relative to regular education costs), the system by which state special education aid is distributed to school districts, and some of the general effects of this overall system. The LAB report also identified four competing special education funding allocation methods, three of which had listed as one of their potential weaknesses the incentive to over-identify students. These three approaches (pupil-weighted, percentage reimbursement, and resource-based), however, all appear much more politically palatable to the fourth option — a flat grant system — that has as its primary drawback that allocation of funds is not connected to the actual costs experienced by a district.[14] This approach had the lowest level of support from district administrators surveyed, at only 34%; yet again, it was the only one to not have the likelihood to promote over-identification.

What is driving the high costs of special education? To be sure, the legal requirements dictated by federal and state special education laws generate a significant portion of the costs for implementing special education in Wisconsin. Yet there is wiggle room in which the state can adopt special education polices that, while satisfying the baseline requirements of federal law, will more efficiently provide the requisite special education to students in need. Generally, there are two primary approaches to keeping special education costs down: 1) to identify fewer students as eligible for special education aid and expand the capacity of regular educators to deal with these students; and 2) to more efficiently provide for the educational needs of students who are identified as in need of special education. This report focuses predominantly on concerns related to the first option.

An in-depth inspection of the current special education funding system and its implications for the quality of special education in the state is outside the scope of this report.[15] Nonetheless, some comments should be made with respect to how funding structures may affect the phenomenon of over-identification. In many ways, the funding system provides mixed incentives for the placement of students in special education. To some extent there is a financial disincentive to districts for placing more students in special education because the administrative, legal, and instructional costs associated with a student being in special education can be high and many of those costs will be incurred by the district without reimbursement by the state or federal government. This concern will be stronger for low-incidence, high-cost students (e.g., the severely retarded); yet these students are also those whose disabilities are not susceptible to subjective determination. On the other hand, students who are identified as having low-cost disabilities, such as an emotional or a learning disability, will place a lower marginal cost on districts. Therefore, a positive financial incentive will exist to identify students into these disability groups. Districts that identify more low-cost disabled students will therefore receive extra aid, yet the districts may not be overly financially burdened. This will occur because a significant portion of state aid for special education is categorical aid and, therefore, is outside of the current revenue limits imposed by the state. Moreover, this categorical aid does not have to be equalized based on district wealth. Furthermore, even some of the costs not covered by categorical aid will be paid for, in part, by the state through equalization aid.

A primary issue regarding whether public dollars are being efficiently spent on special education is whether all the students who are placed in special education are truly in need of special education. In particular, we must determine whether special education dollars going to students who are questionably classified as "disabled" (such as some students in the "emotionally disabled" category) are inappropriately drawing funds away from students who genuinely need the services and support that special education programs were originally geared to serve (such as physically handicapped students, among others). The other, alternative scenario is that even more additional funds will continue to be spent and that special education costs will continue their dramatic incline. Either occurrence is undesirable if it is the by-product of improperly placing students into special education programs.

There is also great variation in the expenditures districts make to educate students identified with disabilities. In 2000-01, school districts reported spending as much as $140,257,829 (Milwaukee) and as little as zero dollars (the K-8 districts of Norway and Union Grove, although these districts did receive federal aid for special education). The average total special education cost reported was approximately $2,496,875 for all districts.

However, a district's overall special education cost is commonly correlated with the district's size and its number of children with disabilities. Therefore, a better measure for comparing special education costs among districts is

the amount of money a district spends on average *for each student in special education*. Rather than looking to just what districts reported as eligible special education costs, the following tables include both these costs and the federal flow-through allocations for the 2000-01 school year. The combination better represents what each district spent in total on special education and does not reflect any double-counting, as the cost figures reported by the district do

TABLE 1 AVERAGE TOTAL DOLLARS (FEDERAL, STATE, AND DISTRICT) SPENT PER DISABLED STUDENT IN SPECIAL EDUCATION IN DISTRICT, 2000-01
AMONG ONLY THE 100 LARGEST SCHOOL DISTRICTS BASED ON STUDENTS ENROLLED

Highest Spending	Amount in Dollars (Number of Disabled Students)		Lowest Spending	Amount in Dollars (Number of Disabled Students)
Elmbrook	26,009 (823)		Burlington Area	7,084 (454)
Whitefish Bay	25,063 (194)		Elkhorn Area	8,617 (273)
Madison Metropolitan	22,679 (4402)		Delavan-Darien	8,809 (349)
Shorewood	22,287 (189)		De Pere	12,449 (299)
Franklin Public	22,037 (397)		Hortonville	13,368 (318)
Greenfield	21,902 (316)		Seymour Community	13,823 (306)
Mequon-Thiensville	21,491 (379)		D C Everest Area	14,021 (636)
New Berlin	21,399 (620)		Reedsburg	14,102 (393)
Wauwatosa	20,578 (635)		Sparta Area	14,297 (383)
Menomonee Falls	20,125 (520)		Howard-Suamico	14,311 (553)

Average across districts: $16,928 Median across districts: $17,082 Standard Deviation: $2,802

TABLE 2 AVERAGE TOTAL DOLLARS (FEDERAL, STATE AND DISTRICT) SPENT PER DISABLED STUDENT IN SPECIAL EDUCATION IN DISTRICT, 2000-01
AMONG ALL SCHOOL DISTRICTS

Highest Spending	Amount in Dollars (Number of Disabled Students)		Lowest Spending	Amount in Dollars (Number of Disabled Students)
Arrowhead UHS	39,996 (127)		North Cape	6,137 (23)
Fox Point J2	29,096 (77)		Waterford Graded J1	6,469 (190)
Lac du Flambeau #1	27,673 (108)		Union Grove J1	6,779 (86)
Nicolet UHS	26,252 (132)		Burlington Area	7,084 (454)
Elmbrook	26,009 (823)		Raymond #14	7,173 (55)
Norris	25,534 (35)		Washington-Caldwell	7,193 (32)
Glendale-River Hills	25,496 (121)		Genoa City J2	7,753 (67)
Whitefish Bay	25,063 (194)		Yorkville J2	7,894 (41)
Cornell	24,604 (82)		Waterford UHS	8,045 (87)
Ladysmith-Hawkins	24,245 (168)		Walworth J1	8,092 (73)

Average across districts: $16,299 Median across districts: $16,294 Standard Deviation: $3,405

not include their federal aid. However, these special education cost figures are over and above the districts'average, per-pupil expenditures. Therefore, the special education costs for each district are added to the districts' per-pupil expenditure for 2000-01, as measured by each district's Current Education Cost per-student figure, to create the full, per-pupil special education cost.[16] The resulting average expenditures per-student in special education for specific school districts are presented in Tables 1 and 2. Figures for all districts are provided in Appendix B.

It is interesting to note that many of the districts spending the lowest amount per-disabled student are those in which the percentage of state and district expenditures comprising the district's overall special education funding is much smaller than their federal aid percentage. For example, the Burlington Area School District saw 83% of its special education funds come from the federal government, and it had one of the lowest expenditures per disabled student, especially for districts of comparable size. Overall, the correlation coefficient between the proportion of district special education cost paid for by the federal government and the average cost per-student with disabilities is -0.58. This means that the likelihood of a district spending more on special education per disabled student increases remarkably when the state and local district pay a greater percentage of a district's overall special education expenditures.

We also see that, of the 100 largest districts, all of the top 10 in terms of spending, except Madison, are relatively high-spending districts from the Milwaukee metropolitan area. It should be noted that even if each districts'average per-pupil expenditure is subtracted from this total, and therefore *only* per-pupil *special education costs* are shown, these same districts largely comprise the top ten. Therefore, it appears that suburban Milwaukee school districts are spending the most per-special education student among the state's larger districts. This result also appears to hold when looking at all districts (see Table 2), where even smaller Milwaukee-area districts (those not in the top 100 in size) are included in the ranking, as Milwaukee area districts remain among the top spenders (i.e., Elmbrook, Arrowhead UHS, Fox Point J2, Nicolet UHS, Glendale-River Hills, and Whitefish Bay).

THE PROCESS OF BEING PLACED IN SPECIAL EDUCATION IN WISCONSIN

To adequately understand the policy of special education, including issues concerning which students truly need special education services and why they do, one must understand the process of special education. The statutory and administrative mandates behind special education are dense and complex. In fact, special education is perhaps the most complicated and administratively burdensome area in all of education policy. The primary disagreement is between those who find this complexity necessary for ensuring that all students have an equal opportunity for education versus those who find various elements of these legal mandates to be overly burdensome and in need of modification or outright elimination. These mandated requirements revolve around determining what services and accommodations in instruction a special education student should receive, how the success of educating special education students should be measured, what should be the policy focus of special education, and how students are placed into special education. It is this last topic that is the focus of this report and to which the following discussion pertains.

Policies and Procedures

While state and federal law may require that all children with disabilities receive a free, appropriate public education, the human actors in the process — namely teachers, other school staff, parents, and perhaps even students — must work to secure this result and begin implementing special education. The step of transforming a so-called "regular" student into a "special education" student cannot be characterized as a simple process that is easily comprehensible. This complexity has been imposed for a variety of policy reasons, including a quest to ensure the protection of disabled students' rights under the law, to better helping children who possess disabilities to learn, and perhaps even to better allocate tasks among school personnel.

The following is a summary of the process by which students come to receive special education services in Wisconsin.[17] This basic summary provides a context for understanding some of the problems with the current special education system, along with the consequences that may result from altering the current system. In particular, attention should be directed at how this process can foster the possible over-identification of students into special education. Within this summary are comparisons among school districts[18] regarding each district's ranking across various measures of special education policy and procedure. These variations show that districts have wide discretion in their decisions related to special education. The variations also suggest that special education in Wisconsin is anything but

a science; rather, it is a system filled with discretionary policies and subjective forces within districts that are sometimes either over-anxious or, conversely, over-tentative to put numbers of their students into special education.

The Special Education Referral: Becoming a Special Education Student

The special education process begins by a written request for a "referral." This request can be made by anyone (although it usually originates from either a child's parent, teacher, or other school staff) to the Director of Special Education in the child's school district. This request will essentially claim that the child in question is disabled as defined under federal or state law and, therefore, needs special education. The effect of a referral is to trigger an elaborate process in which multiple players work together to, ostensibly, evaluate the unique educational needs of the child and to then determine whether the child has at least one disability that would qualify the child for special education.

In the 2000-01 school year, 29,669 students in Wisconsin were initially referred to special education programs. About 66% (19,552) were eventually placed within special education. Yet the rate of initial referrals to special education varies across districts. Table 3 shows the ten districts among the state's 100 largest districts with the highest referral rates and those with the lowest rates. Table 4 provides the same ranking for all districts except for all K-8 districts and Union High School (UHS) districts. The UHS districts are excluded since a vast majority of students are referred to special education before the time they reach high school age; therefore, UHS referral rates naturally tend to be much lower. The K-8 districts are excluded since their percentages will necessarily be higher than districts that have high schools. With no students in high school grades — where few students are initially referred — a greater percentage of the districts' total students are likely to be initially referred to special education. As a result, in both instances, these differences do not reflect any meaningful comparisons with traditional K-12 districts.

In both tables, these figures essentially present the rate of students referred for the first time to special education, which is derived by dividing the number of individual students referred by the total number of students in the district. As with many of the other measures discussed below, referral rates for all 426 districts are provided in Appendix B.

TABLE 3 RATE OF STUDENTS INITIALLY REFERRED FOR SPECIAL EDUCATION, 2000-01*
AMONG 100 LARGEST SCHOOL DISTRICTS BASED ON STUDENTS ENROLLED

Highest Initial Referral Rate	Rate (Number Referred)		Lowest Initial Referral Rate	Rate (Number Referred)
Beloit	4.66 (345)		Oshkosh Area	1.09 (136)
Portage Community	4.61 (133)		Shorewood	1.26 (33)
Ashwaubenon	4.42 (145)		Kimberly Area	1.47 (55)
Fort Atkinson	4.24 (130)		Whitefish Bay	1.49 (59)
Elkhorn Area	4.15 (113)		Mequon-Thiensville	1.52 (77)
Sauk Prairie	4.08 (114)		Beaver Dam	1.62 (69)
Menasha	4.06 (176)		La Crosse	1.72 (172)
Marinette	3.98 (117)		Manitowoc	1.83 (141)
Hudson	3.95 (184)		Wauwatosa	1.84 (175)
Reedsburg	3.89 (112)		Elmbrook	1.86 (204)

Average across districts: 2.76% Median across districts: 2.67% Standard Deviation: 0.75

** According to the DPI, slight inconsistencies in these referral rates may occur because referrals are received by the district of residency, whereas enrollment is based on the district of attendance.*

Looking back to Table 1, we witness that several of the districts with the lowest initial referral rates are also among those with the highest per-pupil expenditures on special education. This connection may suggest a concentration of special education resources in these districts. Comparisons between Tables 3 and 4 also show that smaller

TABLE 4 INITIAL REFERRAL RATE OF STUDENTS REFERRED FOR SPECIAL EDUCATION, 2000-01
AMONG ALL SCHOOL DISTRICTS — EXCLUDING K-8 AND UNION HIGH SCHOOL DISTRICTS

Highest Initial Referral Rate	Rate (Number Referred)		Lowest Initial Referral Rate	Rate (Number Referred)
Flambeau	7.88 (58)		Gilmanton	0.78 (2)
Webster	6.94 (54)		Rosholt	0.98 (8)
Potosi	6.50 (33)		Oshkosh Area	1.09 (136)
Mellen	6.29 (22)		Hilbert	1.20 (9)
Hillsboro	6.21 (41)		Shorewood	1.26 (33)
Siren	5.89 (30)		Pittsville	1.33 (11)
Waterloo	5.86 (65)		Lake Mills Area	1.34 (26)
Williams Bay	5.74 (43)		Beecher-Dunbar-Pembine	1.38 (6)
Lena	5.73 (30)		Green Lake	1.38 (6)
Owen-Withee	5.56 (38)		Darlington Community	1.45 (14)

Average across districts: 3.02% Median across districts: 2.87% Standard Deviation: 1.13

districts have, on average, higher rates of referral and that these rates for the highest-referring districts approach double that of the highest-referring, larger districts.

Referrals are a crucial step in the entire process, for no student may be placed into special education unless he or she is first referred to special education. It only stands to reason, therefore, that districts that refer a greater percentage of their students for consideration of receiving special education will have a greater propensity to place a larger percentage of students. It is important to note that these referrals for the 2000-01 school year are only snapshots of initial referrals for *one school year*. In other words, if one sums the number of students referred each year, then the total proportion of district students who are at some point in their school career referred for special education is rather large, especially in some districts.

Once a student is referred as possibly in need of special education, a determination must be made. This process of evaluating a student's need for special education is strictly defined by state law and regulations. The district evaluation team charged with this task (known in the vernacular as the "M-Team," for multi-disciplinary team) must use multiple, statistically valid evaluation materials and procedures to make its assessment of whether a disability exists. Many of the criteria it must use are specifically set out in the Wisconsin Statutes and Wisconsin Administrative Code. The focus of this evaluation is on determining whether the student fits within the parameters of a variety of specifically defined disability categories. These categories, and their definitions, are presented in Figure 1.

Technically speaking, a student who is said to have a disability must additionally have that disability be deemed by the assessment team as one that *requires* special education.[19] In other words, the law does not require all students with a disability, as defined under the law, to be automatically placed in special education. Rather, the disability must also be one that requires special education instruction and services for the student with the disability to be adequately educated. This point, so often overlooked in the special education policy field, is one that deserves its own resurrection.[20] For many children who manifest some type of minor disability, there should be an attempt to meet the educational needs of those students in regular education programs, if at all possible. Doing so keeps the child from being labeled as in need of special education and keeps districts away from the self-imposition of the high costs, most of which are merely administrative, that accompany this designation.

Under present practice, however, the finding of a disability almost invariably leads to the conclusion that the disability requires some special educational accommodation outside of regular education. The evaluation team then submits its conclusions and recommendations to the child's parent and the district's Director of Special Education. The Director will meet with the evaluation team to discuss the findings and determine the contents of the final report to come out of this process.

FIGURE 1

THE SPECIAL LANGUAGE OF SPECIAL EDUCATION

Autism: a developmental disability significantly affecting a child's social interaction and verbal and non-verbal communication, generally evident before age 3, that adversely affects learning and educational performance. Other characteristics often associated with autism are engagement in repetitive activities and stereotyped movements, resistance to environmental change or change in daily routines, and unusual responses to sensory experiences. The term does not apply if a child's educational performance is adversely affected primarily because the child has an emotional disturbance, as defined [as an emotional behavioral disability].

Cognitive Disability: significantly sub-average intellectual functioning that exists concurrently with deficits in adaptive behavior and that adversely affects educational performance.

Emotional Behavioral Disability: pursuant to s. 115.76 (5) (a) 5., Stats., means social, emotional or behavioral functioning that so departs from generally accepted, age appropriate ethnic or cultural norms that it adversely affects a child's academic progress, social relationships, personal adjustment, classroom adjustment, self-care or vocational skills.

Hearing Impairment (including deafness): a significant impairment in hearing, with or without amplification, whether permanent or chronically fluctuating, that significantly adversely affects a child's educational performance including academic performance, speech perception and production, or language and communication skills.

Learning Disability: a severe learning problem due to a disorder in one or more of the basic psychological processes involved in acquiring, organizing or expressing information that manifests itself in school as an impaired ability to listen, reason, speak, read, write, spell or do mathematical calculations, despite appropriate instruction in the general education curriculum. Specific learning disability may include conditions such as perceptual disability, brain injury, minimal brain dysfunction, dyslexia and developmental aphasia.

Other Health Impairment: having limited strength, vitality or alertness, due to chronic or acute health problems. The term includes but is not limited to a heart condition, tuberculosis, rheumatic fever, nephritis, asthma, sickle cell anemia, hemophilia, epilepsy, lead poisoning, leukemia, diabetes, or acquired injuries to the brain caused by internal occurrences or degenerative conditions, which adversely affects a child's educational performance.

Orthopedic Impairment: a severe orthopedic impairment that adversely affects a child's educational performance. The term includes, but is not limited to, impairments caused by congenital anomaly, such as a clubfoot or absence of some member; impairments caused by disease, such as poliomyelitis or bone tuberculosis; and impairments from other causes, such as cerebral palsy, amputations, and fractures or burns that cause contractures.

Significant Developmental Delay: children, ages 3, 4 and 5 years of age or below compulsory school attendance age, who are experiencing significant delays in the areas of physical, cognition, communication, social-emotional or adaptive development.

Speech or Language Impairment: an impairment of speech or sound production, voice, fluency, or language that significantly affects educational performance or social, emotional or vocational development.

Traumatic Brain Injury: an acquired injury to the brain caused by an external physical force resulting in total or partial functional disability or psychosocial impairment, or both, that adversely affects a child's educational performance. The term applies to open or closed head injuries resulting in impairments in one or more areas, such as cognition; speech and language; memory; attention; reasoning; abstract thinking; communication; judgment; problem solving; sensory, perceptual and motor abilities; psychosocial behavior; physical functions; information processing; and executive functions, such as organizing, evaluating and carrying out goal-directed activities. The term does not apply to brain injuries that are congenital or degenerative, or brain injuries induced by birth trauma.

Visual Impairment: even after correction a child's visual functioning significantly adversely affects his or her educational performance.

Source: Wisconsin Administrative Code, PI 11.36

As with initial referral rates, districts vary widely in their rate of placing students who have been referred — which essentially measures the percentage of students initially referred to special education who actually end up placed in special education that school year. As mentioned above, approximately 66% of all students referred for special education were eventually placed in 2000-01. Ten school districts placed 100% of their referred students into spe-

cial education, yet all of those ten, with the exception of Arrowhead UHS, have less than 700 total students in the district and all, including Arrowhead, have fewer than 75 total students in special education.[21] Table 5 shows the Wisconsin districts, among only the 100 largest, having the highest and lowest rates of placement in special education based on referrals in 2000-01.

TABLE 5 PLACEMENT RATE BASED OF STUDENTS REFERRED FOR SPECIAL EDUCATION, 2000-01
AMONG 100 LARGEST SCHOOL DISTRICTS BASED ON STUDENTS ENROLLED

Highest Rate of Placement	Rate (Total Placements)		Lowest Rate of Placement	Rate (Total Placements)
Beaver Dam	97.10 (67)		Marshfield	38.79 (45)
Mequon-Thiensville	94.81 (73)		West Bend	41.74 (91)
La Crosse	91.86 (158)		Rhinelander	43.07 (59)
Kettle Moraine	90.24 (111)		Superior	44.87 (70)
Hudson	90.22 (166)		Whitnall	46.81 (44)
Fond du Lac	88.89 (200)		De Forest Area	47.47 (47)
De Pere	87.74 (93)		Menasha	48.30 (85)
Green Bay Area	87.68 (676)		Baraboo	48.35 (44)
Greendale	84.51 (60)		Antigo	48.98 (48)
Rice Lake Area	83.33 (55)		Sauk Prairie/Oregon (tie)	50.00 (60/57)

Average across districts: 67.35% Median across districts: 67.59% Standard Deviation: 12.44

This incredibly wide variation in the rate of placement into special education is remarkable. In some districts, such as Beaver Dam, Mequon-Theinsville, La Crosse, and others, once a child is referred for special education they are exceedingly likely to be subsequently placed. In other districts, a referred student has about a 50-50 chance, or less (in nine districts), of being placed. Some possible explanations for these disparities would be: a) districts with higher rates of placement are more careful to initially refer only students likely to be placed; b) individual IEP team members across districts hold differing value judgments on the merit of placing children who are marginally disabled into special education; or c) parents are more organized about getting services for their children. These and other theories are discussed further below, as they directly relate to the possible causes of over-identifying some students into special education.

Once a student is identified as in need of special education by the district's evaluation team, another process begins to set out in detail how that individual child should be educated, why the education is needed, and how success in achieving the child's educational goals will be measured. Another multi-member team is appointed by the district that will meet within thirty days after the evaluation team's report finding special education needs is approved. This team constructs the child's individualized education program (IEP), which is a written plan describing the instruction and other services that will be designed specifically for that student. The focus of this plan is on how the child's educational needs relate to the child's strengths and weaknesses, ability to function in a classroom, and what support the child needs in order to learn. If a school does not properly develop an IEP, the district will be considered as having failed to provide a free, appropriate public education to the student.[22] Moreover, it is a violation of the federal IDEA law to provide any special education services to a child unless that child has a current IEP.

The student's IEP will include the child's specific special education needs and will outline the child's present level of performance, short-term and annual goals and instructional objectives, the child's ability to participate in regular classrooms, and criteria for measuring success of the plan, and various other factors.[23] The least restrictive requirement means that, to the maximum extent appropriate, disabled children should be educated with students who are not disabled. Once the IEP is established, a child's schooling revolves around the particular dictates of the plan.

After a child has been placed within special education, periodic reevaluations of the child's need for special education will be undertaken. These reevaluations can be at the request of district personnel or the child's parent, but must occur, at a minimum, at least once every three years. Statewide, the average rate of reevaluated students resulting in continued eligibility was 82.36% in 2000-01. This relatively high rate shows how generally uncommon it is for students placed in special education to eventually exit the program. Yet some districts have a much smaller percentage of special education students who, after their reevaluation, stay in special education. To help illustrate this point, Table 6 shows those districts with the highest and lowest rates of special education students remaining in special education after reevaluation.

TABLE 6 REEVALUATION RATE RESULTING IN CONTINUED ELIGIBILITY IN SPECIAL EDUCATION, 2000-01
AMONG 100 LARGEST SCHOOL DISTRICTS BASED ON STUDENTS ENROLLED

Highest Rate of Reevaluation	Rate		Lowest Rate of Reevaluation	Rate
Portage Community	96.82		Neenah	57.34
La Crosse	95.44		Stevens Point Area	57.85
Oshkosh Area	95.04		Fort Atkinson	63.06
Cudahy	94.67		Germantown	64.15
Oconomowoc Area	94.59		West Bend	64.23
Burlington Area	94.34		Monona Grove	65.79
Reedsburg	94.17		Merrill Area	67.48
Wauwatosa	93.83		Manitowoc	70.29
Beaver Dam	93.75		Superior	70.33
Sun Prairie Area	93.72		Middleton-Cross Plains	70.87

Average across districts: 81.95% Median across districts: 82.25% Standard Deviation: 8.80

This range of reevaluation rates is as striking as the variation in placements. In districts such as Portage, La Crosse, Oshkosh, and others, a student placed within special education appears destined to remain in special education, even after any subsequent reevaluations. By contrast, in seven of the ten districts with the lowest rate of continued eligibility upon reevaluation, these districts retain only about two-thirds or less of their students previously placed in special education. Differing conclusions can be reached as to why districts vary in their reevaluation placement rates. On the one hand, districts with high rates may be merely repeating a bias towards placement of students seen at the initial referral stage. On the other hand, these districts may have been those that were more cautious and exacting about only placing students truly in need of special education in these programs in the first place and, therefore, these disabilities are more likely to remain manifest upon reevaluation. The flip side of this point is that districts with lower reevaluation rates may be just compensating for poor and improper placement decisions at the initial referral stage.

Overall, if a special education student is continually reevaluated as in need of special education, then the student will remain in these programs until he or she either completes grade 12 or otherwise drops out of school.

Conclusion

Throughout this summary and comparison of districts with respect to various elements of the special education placement process, only a few summary comments and hypotheses have been presented. It is left to those who are better versed in the knowledge of each district's idiosyncratic policies toward special education to make the ultimate determinations about which of these inferences, or other explanations, are accurate. While possible explanations have been speculated upon, the actual factors producing these various rates are not known with any reasonable degree of certainty. Regardless, what is evident is that wide disparities exist across districts in rates of referral to special education, placement rates based on those referrals, and reevaluations of students as in continued need of special education. These wide variations need to be adequately explained, especially by those districts that perform at levels considerably different from the average found across districts in the state.

The Prominent Role of Parents

An appreciation of the strong role that parents play in the special education process in Wisconsin is critical to understanding the overall system of special education and the process of identifying students into special education programs. Parents at nearly every stage in the process hold rights to notice, involvement, and decision-making authority, all of which affects the ability of school districts to restrict the placement of children into special education. Some of the more important rights parents obtain are: to be notified when their child is referred by anyone other than the parent for special education services; to be involved and consulted throughout the entire evaluation process; to be notified of the location of IEP meetings and to approve it; and to have the right to pursue legal action (in the form of written complaints and due process hearing) when the parent disagrees with the district's view of a child's needs or if the district has otherwise violated the numerous rights of the parents and child.[24]

Although the rights conferred by special education laws are given equally upon the parents and student, it is not until the student turns the age of eighteen that the parents' rights do not, in effect, supercede those of the child. In other words, when one discusses a child's right to, for example, an education in the less restrictive environment, that right is co-owned — and enforced by — the child's parents. In the context of concerns about over-identification, many commentators have suggested that parents who expect a greater level of individual attention for their students will, irrespective of their child's actually experiencing a disability, seek special education status so that their child can be accorded special accommodations; not only within the classroom, but also during such important events as college entrance examinations, including extra time for testing. Moreover, this inclination has risen as the stigma of being placed in special education has diminished.

The importance of parents in this process is raised because it introduces another important dynamic in the problem of over-identifying children as with disabilities in need of special education. The state, school district staff, and teachers are not the only persons who determine if students become placed in special education. And parents alone are the only actors in this process, besides the students they often represent, who stand outside of the public schooling payroll. Moreover, these parents are armed with extensive legal rights and means of effectuating their desires.

Legal Matters: Securing Special Education Rights and Incurring Costs

Determining that a student is eligible for special education carries with it extra levels of administrative costs and concerns. Because the right to special education, or more specifically to a free and appropriate public education, is a legally conferred right, significant legal protections regarding the effectuation of these rights are accorded. As a result, disagreements between parents and district representatives at any point before, during, or after the process described above (whether due to action *or* inaction on the part of the district) must be properly handled. These disagreements will be addressed either informally or by the parent formally requesting an independent evaluation, filing a legal complaint, or initiating a due process hearing. Attendant to these disputes are, of course, legal costs and other incidental administrative costs, which can run high.

There are two formal means for persons to seek redress from alleged problems with a district's administration of special education. First, formal complaints with the DPI can be pursued if "Any individual or organization . . . believe a [school district or other] public agency has violated state requirements under Chapter 115, Wis. Stats., or PI 11 Wis. Admin. Code, or federal requirements under the Individuals with Disabilities Education Act (IDEA) when providing special education programs."[25] These complaints, which can be filed by those other than parents of students, allege specific violations affecting a single child or parent, a group of children, or it may allege systemic violations throughout the district's special education program.[26] If the DPI finds that the district has violated requirements relating to special education, then the accused district must develop and implement a plan to correct the violations.

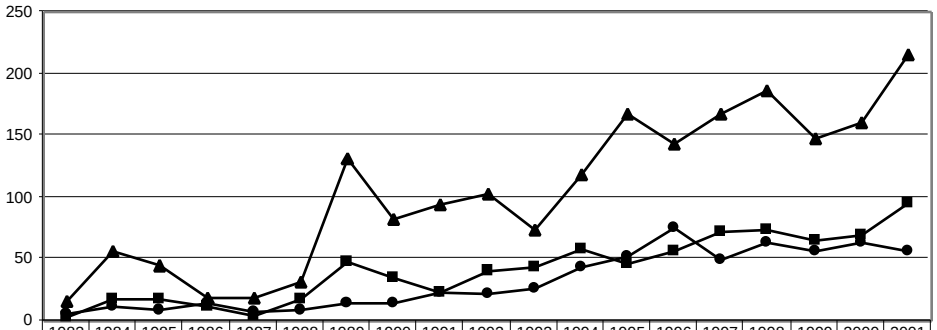
Similarly, due process hearings address objections by parents over anything involved in the district's response to a referral or evaluation. Parents, students, or school district representatives request a due process hearing "whenever there is a dispute between the parent and the school district over the district's proposal or refusal to initiate or change the identification, evaluation, proposed IEP or portion thereof, the implementation of the IEP, educational placement, or the provision of a free appropriate public education (FAPE)."[27] In other words, unlike a complaint, the

focus of a due process hearing is on matters related to a child's placement and specific IEP.[28] When a hearing is requested, the DPI appoints an impartial hearing officer to conduct the hearing, with this officer eventually issuing a written decision based solely upon the evidence presented at the hearing.

Mediation is also considered an option to resolve these issues. Many cases are settled informally rather than by a hearing officer's actual decision. Still, the cost from increasing due process claims and complaints are significant. The costs also go beyond those accounted for by the requisite proceedings. It is magnified by the mere threat of these proceedings which, as just discussed, are undertaken at little cost to parties bringing the claims against a school district.

These costs are a growing concern, given that the number of complaints and due process filings has been steadily increasing during the past few decades. Figure 2 shows how the number of complaints brought per year has steadily increased, while the number of due process filings has similarly risen. From 1997-2001 there were 53% more complaints heard and 32% more due process filings made than during the five years prior to that period. Moreover, the number of issues raised in these formal complaints has increased substantially during the past two decades. As recently as 1993, there were only 73 issues heard due to special education complaints, while in 2001 there were 215 issues raised, a startling rise of almost 300%.

FIGURE 2 SPECIAL EDUCATION COMPLAINTS & DUE PROCESS FILINGS



	1983	1984	1985	1986	1987	1988	1989	1990	1991	1992	1993	1994	1995	1996	1997	1998	1999	2000	2001
Number of complaints	3	18	18	12	5	17	47	35	23	40	44	58	46	57	72	74	65	69	96
Number of Issues Heard in Compliants	16	56	45	19	19	32	131	82	94	103	73	119	168	143	167	187	147	160	215
Due Process Filings	6	12	8	14	7	8	14	14	23	22	26	44	52	75	49	64	57	63	57

Sources: Wisconsin Department of Public Instruction, IDEA Complaints—Statistic, available at <http://www.dpi.state.wi.us/dpi/dlsea/een/com_stat.html> and Due Process Hearing Statistics, available at <http://www.dpi.state.wi.us/dpi/dlsea/een/due_stats.html>.

Moreover, particular districts seem to have an inordinate amount of these actions when considering the number of total students in the district. The number of complaints heard in 2001, broken down by the districts in which those complaints originated, is shown in Table 7. When these frequencies are weighted according to the total number of students in each district, one can see that complaints were logged against a few districts at a higher percentage than would be expected, given those districts'percentages of the state's total student population. Certainly those districts with but one or a few complaints deserve little concern, as any particular district in any given year is ripe to field one or two such complaints. Yet districts such as Milwaukee, Madison, and Appleton appear to face a greater number of complaints relative to other state districts. The Milwaukee Public School district's (MPS) inordinate amount of complaints is likely related to the concerns that generated a class action federal lawsuit filed in September 2001 by the Wisconsin Coalition for Advocacy against the MPS and DPI. This lawsuit alleged that school officials have been either failing to determine special education plans for disabled students, or that officials have been ignoring plans that do exist.

Not all of these complaints, however, pertain to identification concerns. Many of them actually relate to IEP planning and implementation issues that occur well after the identification process has been completed. Still, the growing number of complaints suggests that a significant number of parents, students, and/or their advocates believe, correctly or not, that the district is failing in its special education program.

TABLE 7 DISTRIBUTION OF IDEA COMPLAINTS ACROSS DISTRICTS IN WISCONSIN, 2000-01

NUMBER OF IDEA COMPLAINTS IN 2001	PERCENTAGE OF COMPLAINTS	DISTRICT(S) (% OF STATE'S TOTAL ENROLLMENT IN DISTRICT)
39	40.6%	Milwaukee (12.06)
8	8.3%	Madison (2.88)
5	5.2%	Appleton (1.83)
4	4.2%	Racine (2.54)
3	3.1%	Montello (.09), Sun Prairie (.52)
2	2.1%	Marinette, Middleton-Cross Plains, Rhinelander, Verona, Washburn, Wilmot UHS
1	1.0%	Belleville, Evansville, Green Bay Area, Kaukauna, Kewaunee, Lake County, Lake Holcombe, Lodi, McFarland, Medford, Nicolet UHS, North Crawford, Omro, Salem Jt #2, South Milwaukee, Schiocton, Stoughton, Unnamed district, Viroqua, Watertown, Waunakee, West Allis
0	0.0%	Remaining 392 districts

Source: Wisconsin Department of Public Instruction, 2001 IDEA Complaints Index, available at <http://www.dpi.state.wi.us/dpi/dlsea/een/com01men.html>.

As alluded to earlier, a persistent concern with due process hearings, compliance complaints, and lawsuits related to special education is that districts will feel compelled to place children into special education — whatever the cost to do so — if there is any threat by parents, teachers, or public interest groups alleging that the district should be placing more students. This compulsion will be based on fears of legal action directed at school districts viewed to be remiss in their placement policies or actions. To be sure, legal threats could also come from those who believe that districts are over-identifying children into special education, which would produce reverse incentives in terms of legal costs. However, there appear to be fewer threats moving in this direction in the state as compared to actions meant to induce greater placements.

The Focus on Identification

As can be gleaned from the preceding overview, the special education process revolves around the identification of students who are considered to be in need of special educational teaching and services. It is not until students become classified as in need of these services that special education programs are allowed to operate. While this fact may appear overly basic and obvious, it is central to an understanding of the workings of current special education policy. For a student to receive special education instruction in Wisconsin, that student must be considered as a "child with a disability."[29] This term is further defined as "a child who, by reason of any of the following, needs special education and related services. . .,"[30] with the "following" being a listing of the ten specific disability groups previously explained in Figure 1.

Yet the legislatively drafted statutes do not define what precisely these disabilities are, such that students can be appropriately identified as afflicted by that disability. Rather, the DPI has been granted the authority to provide definitions of these disabilities, and it has done so through the Wisconsin Administrative Code. In July of 2001, new eligibility criteria for identifying children for special education went into effect in Wisconsin. These criteria were developed both as an attempt to better align Wisconsin's criteria with federal regulations and to limit the propensity for over-identification that is believed to be occurring. While better alignment with federal rules has seemingly occurred, the jury is still out on the second concern.

Still, this focus on identification remains embodied in the Individual Education Program (IEP) process. As described earlier, the primary focus in establishing a student's IEPrevolves around identification of the students' need for formal special education. In fact, it entails identification-plus. Not only must a student be properly identified as in need of special education, but also the student must be properly identified into the correct disability group or groups.

Many commentators question the efficacy of focusing so predominantly on the issue of properly identifying students by their disability. To the extent that proper identification of a student's disability aids in the determination of the appropriate educational needs of that student, focusing on identification can be an effective strategy. Yet blind faith that correct labeling of students will lead to solid outcomes is often misplaced. Proper identification is clearly not a saving grace in many, perhaps a majority of cases, because educators dealing with students who may all share, for example, the "learning disabled" classification will necessarily vary widely in the degree and nature of each student's learning disability. Moreover, there is a likely overlap to the techniques that will effectively help all disabled students, whether they are learning disabled, cognitively disabled, or so forth.

Unfortunately, many elements of special education policy in Wisconsin appear to exhibit a belief that special education not only begins with identification, but that it also ends with identification. This view of special education finds the technical identification of students, based on eligibility criteria, the primary goal of the programs and the primary measure of success. A focus on the mere proper identification of students is not the best expenditure of time, effort and resources for students with disabilities.

This is not to claim that educators find their role in providing educational development to students with special education needs to be complete upon simply classifying students correctly. Special education teachers work assiduously to teach students who have more difficult, and sometimes exceedingly more difficult, capabilities of learning. This ability to teach these students is due in part to the focused and limited nature of special education teachers' duties. Likewise, correct identification of students may often better signal which types of assistance and education will best suit them, given their disabling condition. Nonetheless, policymakers may discover that a shifting focus in special education from identification by discrete disability types to better ensuring that all students are learning to the best of their ability would best serve all K-12 education in the state.

THE CONCERN OF OVER-IDENTIFICATION

Independent of concerns over whether a focus on identification of students by disability groups suppresses attention to actual teaching and learning are concerns related to whether students are being properly viewed as disabled under special education law and policy. An overarching and growing concern with special education policy is that there exists an over-identification of students as in need of special education. In other words, students who should not be deemed disabled in order for them to be properly educated are nonetheless being placed within special education.

Special education began as a policy to aid in the education of students with severe disabilities that inhibited their ability to learn effectively in regular education settings. This understanding — that special education is directed at the mentally and physically handicapped — is still maintained today to some extent, but it has lost its focus. As special education comes to serve a larger percentage of students, it is clear that students who are on the margins of fitting the classical image of a truly mentally or physically disabled student are nonetheless being placed in special education. The primary question is whether this development is desirable.

In conjunction with Wisconsin's change in special education eligibility criteria last year, the state legislature has required the DPI to conduct a study on the effect of the modification of special education eligibility criteria.[31] A preliminary report from this study is due in June 2003, with a final report scheduled to be released in June 2005. According to then-State Superintendent John Benson, "the reports are to include information and data on a number of factors, such as incidence rates, an analysis of various factors that may impact incidence rates, and an analysis of pupil performance on state assessment measures."[32] Benson also expressed that the need for this study is great, remarking that he has "been concerned for years with the increasing special education incidence rate in Wisconsin public schools. As early as 1993, I shared my belief that too many children were being identified as having disabilities and placed in special education programs . . . ."

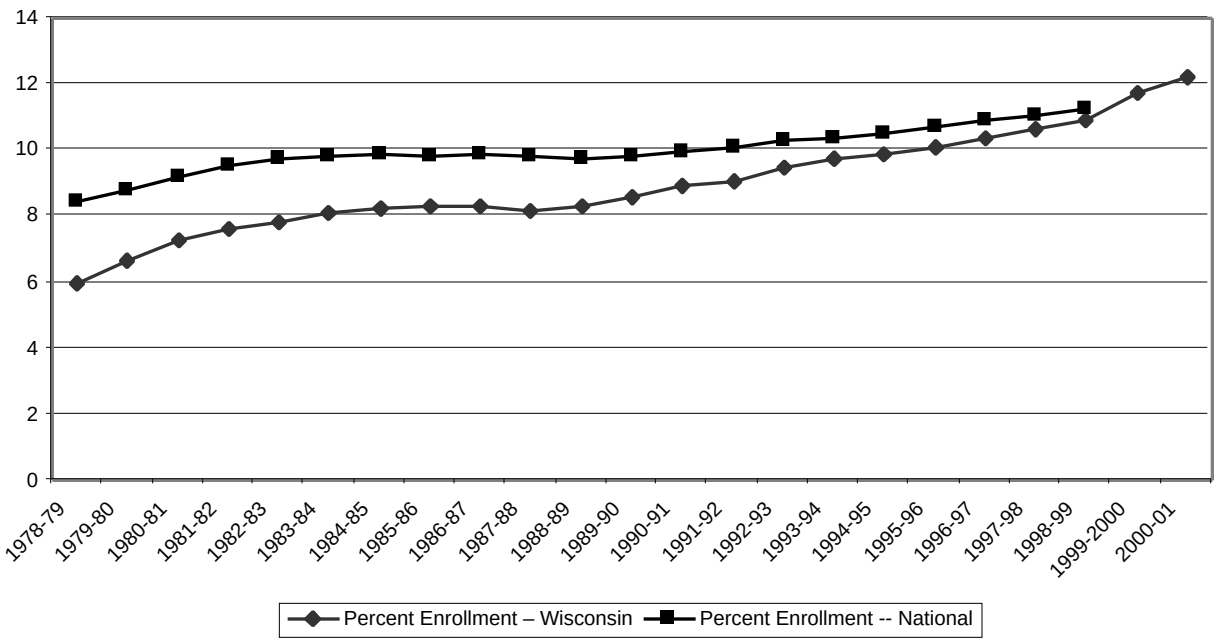
The other overarching concern is that the time, resources, and effort placed into identifying students by discrete disability categories could all be better allocated to simply serving the educational needs of students. The potential negative effects with over-identifying students into special education will be discussed later in this report.

Statewide Trends

The percentage of Wisconsin students identified as in need of special education has increased steadily in the past quarter century, with the rate of increase being significantly higher than that of the nation as a whole. In fact,

Wisconsin's rate of increase in the identification of students with special education needs from the mid-1970s to the mid-1990s was the seventh-highest in the nation.[33] This increase moved Wisconsin from ranking forty-fifth among the states and District of Columbia to being twenty-sixth, over the same period.[34] Figure 3 illustrates this rising incidence of students being identified as in need of special education.

FIGURE 3 PERCENTAGE OF STUDENTS AGE 6-17 IN SPECIAL EDUCATION WISCONSIN AND NATION, 1978-79 THROUGH 2000-01



District-by-District Comparisons

Different school districts throughout the state, however, are driving this increase to widely varying degrees. Which districts have the highest proportion of their students classified as needing special education? Table 8 shows the ten state school districts with the highest percentage of students identified as in need of special education and the ten districts with the lowest percentage of such students. Tables 9 and 10 present the same numbers for only the 100 largest districts and only K-8 districts, respectively. Finally, Table 11 compares the ten Union High School districts in the state. Appendix A provides a complete ordering of all districts by their percentage of disabled students among all students.

It is important to note that these percentages are based on the number of students with disabilities over the total number of students enrolled within the district in both public *and private schools*. This recognition is important because if just public schools were used in the analysis (as others have done), the percentages would be higher for most if not all districts. For example, while 12.2% of the state's total student enrollment was in special education in 2000-01, 14.5% of state's public school population was in special education.[35] Moreover, districts with a greater percentage of students in private schools may have a smaller overall percentage of students with disabilities than districts with the same total number of students, yet with fewer private school students within that total. The reason for both of these results is that students with disabilities in Wisconsin are overwhelmingly served by public schools versus private schools. Only 1.2% of all students in special education in the state are in private schools.

The choice was made to use total public and private enrollment, versus just public school enrollment, since special education is a mandate directed at all children, not just public school students. It would be inaccurate, in a sense, to look solely to public school enrollments because a district would have been required to pay for the special educational needs of any private school students if they had been disabled and attended public schools. It should be noted

that a public school district that houses a student with disabilities is not required to pay for that child's special education costs in a private school unless the district itself is unable to meet the child's needs.[36] Therefore, parents have a huge financial incentive to place their disabled children in public schools, if not permanently, at least long enough to show that the public school was ineffective at serving the child's needs such that it will pay for private schooling. Another reason for using total enrollment as the baseline is based more out of practicalrealities — most of the data provided by the DPI on special education, including those in the Special Education Reports, provide figures only based on both public and private enrollment.

TABLE 8 PERCENTAGE OF STUDENTS IDENTIFIED AS DISABLED IN 2000-01
AMONG ALL SCHOOL DISTRICTS

Highest Percentage of Students with Disabilities	Percentage (Number)		Lowest Percentage of Students with Disabilities	Percentage (Number)
Norris	31.53 (35)		Lake Country (K-8)	3.17 (46)
Menominee Indian	30.27 (300)		Maple Dale-Indian Hill (K-8)	4.35 (83)
Sharon J11 (K-8)	23.96 (69)		Fox Point J2 (K-8)	4.38 (77)
New Auburn	23.12 (80)		Whitefish Bay	4.90 (194)
Lac du Flambeau #1 (K-8)	21.09 (108)		Swallow (K-8)	5.22 (18)
La Farge	20.82 (66)		Geneva J4 (K-8)	5.38 (7)
South Shore	20.73 (51)		Arrowhead UHS	6.54 (127)
Wauzeka-Steuben	20.16 (76)		Wauwatosa	6.67 (635)
Benton	20.07 (60)		Whitnall	6.67 (267)
Mellen	20.00 (70)		Lake Geneva-Genoa City UHS	6.74 (75)

Average across districts: 12.90% Median across districts: 12.65% Standard Deviation: 3.31

TABLE 9 PERCENTAGE OF STUDENTS IDENTIFIED AS DISABLED IN 2000-01
AMONG 100 LARGEST SCHOOL DISTRICTS BASED ON STUDENTS ENROLLED

Highest Percentage of Students with Disabilities	Percentage (Number)		Lowest Percentage of Students with Disabilities	Percentage (Number)
Beloit	18.67 (1383)		Whitefish Bay	4.90 (194)
Monroe	17.44 (495)		Wauwatosa	6.67 (635)
Stoughton Area	16.00 (635)		Whitnall	6.67 (267)
Sauk Prairie	15.40 (430)		Shorewood	7.24 (189)
Madison Metropolitan	14.99 (4402)		Greendale	7.38 (230)
Ashwaubenon	14.56 (478)		Mequon-Thiensville	7.46 (379)
De Forest Area	14.48 (445)		Elmbrook	7.49 (823)
Green Bay Area	14.23 (3575)		Onalaska	7.84 (257)
Janesville	13.78 (1688)		Manitowoc	8.25 (637)
Reedsburg	13.65 (393)		Hamilton	8.28 (376)

Average across districts: 11.35% Median across districts: 11.41% Standard Deviation: 2.28

TABLE 10 PERCENTAGE OF STUDENTS IDENTIFIED AS DISABLED IN 2000-01
AMONG K-8 SCHOOL DISTRICTS (47 IN TOTAL)

Highest Percentage of Students with Disabilities	Percentage (Number)		Lowest Percentage of Students with Disabilities	Percentage (Number)
Sharon J11	23.96 (69)		Lake Country	3.17 (46)
Lac du Flambeau #1	21.09 (108)		Maple Dale-Indian Hill	4.35 (83)
Twin Lakes #4	19.05 (76)		Fox Point J2	4.38 (77)
Linn J4	17.53 (17)		Swallow	5.22 (18)
Trevor Grade	16.94 (62)		Geneva J4	5.38 (7)
Boulder Junction J1	16.73 (41)		Richfield J1	7.14 (46)
Herman #22	16.30 (22)		Norway J7	7.30 (10)
Neosho J3	15.86 (36)		Merton Community	7.49 (63)
Linn J6	15.52 (18)		North Lake	7.57 (32)
Silver Lake J1	14.76 (89)		Paris J1	7.88 (23)

Average across districts: 11.83% Median across districts: 11.56%

TABLE 11 PERCENTAGE OF STUDENTS IDENTIFIED AS DISABLED IN 2000-01
UHS SCHOOL DISTRICTS (ALL 10)

District	Percentage (number)
Lakeland UHS	16.26 (158)
Big Foot UHS	14.12 (74)
Union Grove UHS	13.03 (86)
Wilmot UHS	12.69 (132)
Hartford UHS	10.52 (179)
Nicolet UHS	9.76 (132)
Waterford UHS	8.78 (87)
Central/Westosha UHS	6.78 (77)
Lake Geneva-Genoa City UHS	6.74 (75)
Arrowhead UHS	6.54 (127)

Average across districts: 10.52% Median across districts: 10.14%

These tables and their underlying data reveal some interesting observations that are reflective of trends beyond simply these top-ten and bottom-ten listings. First, districts with a larger percentage of students identified as disabled generally tend to be smaller school districts rather than those serving larger populations of students. In fact, only eight of the fifty school districts with the highest prevalence of disabled children were districts with over 1000 students enrolled. Moreover, among smaller districts (defined here as those less than 2000 total students enrolled), these districts average having 14.02% of their student populations listed as disabled, while among larger districts (enrollment at or greater than 2000 students) that average is only 11.93%. Of course, given that these figures are percentages, the actual number of disabled students in these smaller schools (15,726) is dwarfed by the number of such students in larger schools (108,779). Still, at the same time that total student enrollment in the state's small schools constituted 11.2% of the state's total school enrollment, these small schools served 12.6% of the state's special education students. Together, these figures suggest that while a greater number of small districts have a larger percentage of their students identified as disabled, this difference is being strongly driven by outlier districts that have a disproportionate number of students identified as disabled.

A second observation is that variations seem to persist among all types of district categorizations. Large districts, small districts, K-8 districts, and even Union High School districts all experience wide variation between those dis-

tricts at the top and bottom in terms of their overall percentage of students placed in special education. Moreover, this variation is not merely seen at the top and bottom districts ranked in the tables, based on but a few outliers. To show this point, we look to the "standard deviation," which is a measure of how dispersed values in a data set are from the average value for that set of data. The standard deviation of the percentage of students in special education among all districts is 3.31%. This means that approximately 35% of all school districts have either more than 16.2% of their students in special education or less than 9.6% in such programs, which is distant from the average of 12.9%.

Third, districts with a higher percentage of students in special education appear to come from many different regions of the state. This is true when looking at all districts in the state, yet when looking only at the 100 largest districts, the top ten districts in terms of their percentage of students in special education seem to cluster around the Madison and Green Bay areas. Districts with the lowest percentages, however, appear to be overwhelmingly from the Milwaukee metropolitan area.

Overall, this evident variation is a genuine concern. Ideally, given that the mandates of special education laws revolve around satisfying the educational needs of each individual student, *wherever they may reside*, the law seemingly dictates that a student who is deemed disabled in one district would also be found disabled by another district's evaluation team. If this result does not obtain, as the foregoing data seem to suggest, then either some school districts are identifying students into special education who are not disabled or some districts are failing to identify disabled students who are in need of special education, or a combination of both.

To be sure, the mere high incidence of identifying children as in need of special education does not *per se* mean that such districts are "over" identifying students into special education. It is certainly plausible that these districts are populated by a disproportionate number of students in need of special education. Some districts do have readily available explanations for their deviation from the norm. The Norris District, for example, is a terribly small district (only 111 total students) and is a Residential Care Center (otherwise known as a "group home") for juvenile delinquents, students who may be more prone to possessing various disabilities. Likewise, many commentators have long suggested that children from predominately low-income areas are more prone to experience negative health conditions due to a myriad of social and economic factors, and therefore would be more prone to exhibit disabilities. Therefore, one might hypothesize that districts with a large percentage of low-income students would be more likely to eventually need special education. One may reverse the analytical lens and also be concerned about the "under-identification" that may be occurring in districts with low percentages of special education students.

Overall, without adequate explanation by districts as to why a higher or lower percentage of their students are deemed disabled and in need of special education programs, legitimate inquires can be made as to why these vast differences occur. If one assumes that the number of children in the state who are disabled is randomly distributed, then one would theorize that the percentage of such students in any one district would be approximately equal. While this assumption likely does not hold true in all instances, the variation actually found should not be that great, especially among districts of similar economic and demographic characteristics. Nonetheless, the variation found in the state, as seen in Appendix A, holds across all types of districts. Therefore, it is incumbent on districts that are well below or well above the state average to offer explanations for why the percentage of their students who are placed in special education deviates so noticeably from the norm.

DISSECTING IDENTIFICATION PHENOMENA BY DISABILITY GROUPS

While special education aims to help the education of all students with disabilities affecting their learning, special education policies have been designed to address these students by their specific disability categories. In other words, children are not merely determined to be disabled when placed into special education; rather, they are found to be disabled in one of ten different, although potentially overlapping disability categories. The question is, how do identification rates, trends, and potential for over-identification differ among these groups?

Pursuant to the IDEA, each state must submit data every year on various measures related to the provision of special education.[37] Included in these data submissions are figures on the prevalence of each type of disability served under special education programs. This annual "child count" for Wisconsin during the 2000-01 school year is presented in Table 12. It is important to note that these figures only represent a student's primary disability. Many students are afflicted by multiple disabilities and could fall in multiple disability classifications, but are listed only by the one disability that is deemed their primary disability.

TABLE 12 2000 - 2001 FEDERAL IDEA CHILD COUNT — WISCONSIN
BY AGE GROUPS & PRIMARY DISABILITY — DECEMBER 1, 2000
AS AMENDED OCTOBER 30, 2001

Primary Disability	3-5	6-11	12-17	18-21	Total	Percent	Percent Change from 1996-97
Autism	306	1,206	525	93	2,130	1.70	148.8
Cognitive Disabilities	394	4,933	6,422	1,674	13,423	10.71	-0.1
Deaf-Blindness	1	3	4	0	8	.01	-11.1
Emotional Disturbance	255	5,182	10,102	1,026	16,565	13.21	0.6
Hearing	163	667	642	84	1,556	1.24	4.6
Learning Disabilities	117	19,161	30,549	2,861	52,688	42.03	17.6
Other Health Impaired	615	3,426	2,639	217	6,897	5.50	175.2
Orthopedically Impaired	286	721	518	86	1,611	1.29	-16.0
Significant Developmental Delay (Ages 3-5 only),	2,208	76	0	0	2,284	1.82	998.1
Speech/Language	9,973	15,289	2,055	85	27,402	21.86	-2.1
Traumatic Brain Injury	35	110	167	44	356	.28	27.1
Vision	30	195	189	24	438	.35	-3.3
Totals	**14,383**	**50,969**	**53,812**	**6,194**	**125,358**	**100.0**	**13.5**

Source: http://www.dpi.state.wi.us/dpi/dlsea/een/cc_12_1_00.html; based on Federal Data Collection form PI-2197 submissions.

A couple of important observations can be made by inspecting these figures. First, these numbers show that the most prevalent disability in the state is that of "learning disabled" (42%), followed by "speech/language" disabilities (22%), "emotionally disturbed" (13%), and "cognitively disabled" (11%), with the remaining categories together constituting just twelve percent of the primary disabilities for all disabled students in Wisconsin. This distribution helps to provide some context when discussing which disability groups may be driving the increasing rate of identification of children with disabilities.

Another observation from these data is the curiously increasing figures on learning disabilities and emotional disturbance. There are 60% more students in the age group of 12-17 identified as learning disabled than in the age group of 6-11. If learning disabilities should be correctly understood as disabilities that exist *within* students, independent of their exposure to education within the schools, then it is troubling that a significantly greater number of students have been identified with learning disabilities in the six-year age group of 12-17 than in the six-year age group of 6-11. Why a child is not learning disabled when in the third grade, yet becomes learning disabled by the time he or she is in the eighth grade, is a troubling question. Similarly, in terms of emotional disabilities, it appears that emotional disturbances become much more commonly identified as children get older. There are 95% more emotionally disabled children in the older age groups than the 6-11 group. This makes intuitive sense in some ways, as children generally do not exhibit socially deviant behavior until they reach adolescence, commonly around the time of middle school.

One plausible explanation for these increases may be that it takes more time, observation, and exposure to formal schooling for many students' learning or emotional disability to become sufficiently manifest. Nonetheless, as will be discussed below, social factors that may produce educational problems for students are expressly denied consideration when identifying a child as either learning or emotionally disabled. Moreover, under state guidelines, students are not suppose to be identified as learning disabled based upon poor teaching or poor schooling environments. The notion is that these disabilities are supposed to belong to individual students, not to be a condition placed on them by the schools themselves. Together, these figures lend credence to criticisms that current state special education policy operates as a "waiting to fail" system, whereby student education needs are addressed only after it becomes clear that a student is not succeeding in regular education classes. Unfortunately, this recognition can occur well after a student has passed the age at which he or she might be helped most effectively.

Third, outside of learning and emotional disabilities, it appears that the number of students within each disability group remains relatively constant as children grow older. For example, cognitive disabilities increase in number by only 30% between the 6-11 age group versus the 12-17 age group. In some cases, disability incidences decreased dramatically as children get older. Perhaps one of the best signs is how many fewer students have speech and language disabilities after the age of 11 compared to those before that time. This decreasing number (2,055 versus 15,289) suggests that educators and speech and language therapists are working well to identify and then address students with speech and language impairments at early ages.

Finally, another measure of interest relates to the relative rate of increase in students identified as in need of special education by the various primary disabilities. Have the percentages of students in each impairment area increased at similar rates, or have some disability groups experienced a much greater rate of increase? In addition, if disparities do exist, what are the possible reasons for any disparities? It is clear that some disabilities are being identified at a much higher rate than they were a mere four years ago. Between 1996-97 and 2000-01, an astonishing 149% more autism cases and 175% Other Health Impairment cases came to exist. The latter increase is likely caused by recent federal guidelines allowing children with attention-deficit disorder — a problem that more and more children (correctly or incorrectly) have been found to hold in the past decade — to be placed in this group.

Despite the dramatic percentage increases found in the preceding disability groups, perhaps the most noteworthy increase, in terms of its effect on the overall special education system, is that found with learning disabilities. Even though the number of students with learning disabilities increased only by 17% in this four year period, the significance of this increase is a function of this category being, far and away, the largest in terms of students identified into special education. In fact, during this four-year period, the increasing number of learning disabled students accounted for 53% of the total increase of students in special education. While it is true that learning disabled students tend more to be of the high-incidence, low-cost variety, they still require a degree of special education costs. While a more-detailed discussion of the learning disabled criteria is presented below, it is helpful to note the prominence of learning disabilities in the context of between-disability comparisons.

THE USE OF ELIGIBILITY CRITERIA FOR SPECIAL EDUCATION: SCIENCE OR ART?

At the center of the debate on over-identification of students for special education is the process by which students become placed in special education. As discussed at length above, many of the procedural and legal elements of the process have a direct effect on the reasons why students become placed in special education. While all elements of this process have a significant impact on this outcome, the most important factor is the use (or non-use) of eligibility criteria for defining disabilities that both, in one sense, permit a student to be placed in special education while, in another sense, require a student to be placed. The term "require" is used because, under federal and state law, students identified as disabled must be appropriately granted all the rights incident to the effectuation of their "free and appropriate public education." Yet the term "permit" is appropriate since the state DPI is given wide discretion in defining what each disability actually is, and in letting districts decide which students fall within that disability. Moreover these eligibility criteria are merely meant to aid IEP teams in determining whether an individual student is in need of special education services as required under the IDEA. The ultimate decision lies with individual district IEP teams.

A few sources provide the primary guidance for determining how students are to be assessed about their eligibility for a particular disability. The most controlling in Wisconsin is the Wisconsin Administrative Code, Chapter on Public Instruction, Section 11.36. New rules modifying these provisions relating to identification of children with disabilities went into effect July 1, 2001, and therefore have been in effect for only one year. The definitional criteria expressed in the Code are copied verbatim by the DPI's *Model Local Educational Agency Special Education Policies and Procedures*, which is distributed to school districts to aid them in implementing the state's special education program. In addition, the DPI has recently produced "technical assistance guides" that are meant to better enable district personnel in assessing and determining whether some specific disabilities exist amongst the district's students. The final source is the federal regulations promulgated to explicate the mandates of the IDEA, which provide baseline requirements for all states to follow when determining eligibility for special education, among other policy decisions.

It is helpful to parse the disability groups currently recognized as eligible for special education by separating those that are based more on scientifically valid assessment mechanisms and those that may include a greater number of students who are actually not disabled. The eligibility categories discussed in detail below — learning dis-

abilities and emotional disabilities — fall in to the second category, and they are open to great variation in opinion as to whether a student actually "qualifies" as being within that disability. There is little sound science behind diagnosing these "disabilities." In fact, these categories have been dubbed "judgmental" categories, because "the children so classified typically do not exhibit readily observable distinguishing features, and the authoritative diagnosis of medical professionals, which is common in assessment of many of the low-incidence disabilities, is absent."[38]

This nebulous nature of the criteria for being classified into these groups poses two problems. First, the criteria for these classifications, by failing to forge a bright-line standard that has the accompanying benefit of certainty, causes the need for a greater number of cases to be decided at the margins. These cases involve students who fail to manifest obvious physical or mental impairments, but rather are afflicted by some less-severe disability, such as mere behavioral or motivational problems. Allowing children with these characteristics to be considered for special education makes proper identification a more difficult and expensive process. Furthermore, while these criteria may provide an improved basis for identifying children who are actually disabled, they may also generate "false positives."[39] That is, they may foster the misidentification of disability among children who are not in fact disabled, despite the hunches of some teachers, social workers, or parents.

The second problem is that the administrative costs associated with ensuring correct identification will increase relative to the special education dollars actually going to aiding the education of disabled students. In other words, dollars that could be better used to actually aid students in their learning and FAPE requirements are instead shifted to matters unrelated, at least directly, to actually aiding in children learning well. This point is crucial. The demands of proper categorization, including the administrative processes surrounding special education, often inhibit the ability of simply trying to understand the educational needs of children. It is less important that a child be properly determined "learning disabled" versus "emotionally disabled" than for that child, whatever his or her disability, to be as well-educated as he or she can be. The present system, unfortunately, errs on the side of spending more time getting the labeling correct and less time making sure these students are taught well.

For purposes of the following district comparisons, only larger districts (the top 100 as measured by total student enrollment) are included in the data analyses. In addition to the reasons mentioned earlier, this limitation is made because when talking about discrete disability categories, many of the smaller districts have fewer than five students within a particular category. As a result, no data have been reported in order to protect student confidentiality within those districts, as required by law. Moreover, since percentages are used to better weigh values for across-district comparisons, a concern with including smaller districts is that merely a few students can radically shift a district's percentages, with little meaningful comparative effects resulting. In other words, the attempt is to compare like districts to like districts in terms of each district's percentage of students with disabilities and overall number of total students. This need is even more compelling, given the earlier finding that smaller districts in Wisconsin tend to have a higher percentage (but of course a much fewer overall number) of students in special education. For those readers wishing to see comparable figures for districts not in the top one-hundred (or for those in the top 100 yet not in the top ten or bottom ten for any measure), Appendix B presents the figures for all districts across these various measures.

In addition, when comparing data on rates of incidence of these various discrete disability groups, there are two meaningful measures by which to rank districts. First, districts can be ranked by the percentage of total students in the district who have the particular disability identified as their primary disability. The benefit of this figure is that it spans the entire student body as its means of comparison. The drawback of this figure is that it does not necessarily reflect how frequently students who are identified as disabled become assigned to the particular disability classification in question. In other words, it does not reveal how frequently *children placed in special education* in that district tend to be identified by a particular disability. Therefore, the second measure looks to the percentage of students identified as disabled who are listed by that primary disability. Of course there is often correlation between these two figures, but they represent different meanings of incidence and are therefore both presented. Both of these measures show which districts identify a disproportionate percentage of their disabled students in a particular impairment category.

Learning Disabled

As was shown in Table 12, over 40% of all special education students in Wisconsin have "learning disabled" as their primary disability. As a result, learning disabilities are by far the largest cause for the placement of students in special education. Moreover, learning disabilities alone accounted for 50% of the growth in special education from 1991-92 to 2000-01 nationally, and approximately 47% of the increase in Wisconsin during that same period. Yet

unlike disability categories such as, for example, speech impairment and cognitive disability, which are considerably more specific regarding what manifested disabilities fall under that term, learning disabled can mean a myriad of things. It is this difficult-to-grasp and difficult-to-limit definition that gives birth to concerns with these enormous increases in students identified by this disability, both nationally and in Wisconsin.

The Meaning of this Disability?

The learning disability category has been commonly referred to as the "catch-all" of special education — it is the group in which poorly learning students can readily be placed with little need to find a manifest, specific accompanying mental or physical disability. Despite the fact that this group is now called "specific" learning disability, there is little that is specific about it. According to some experts on this subject, "[Learning Disability] remains one of the least understood and most debated disabling conditions that affect school-aged children."[40]

The central diagnostic criterion for identifying a child as learning disabled is that the child reaches unexpectedly low levels of achievement.[41] This analysis relies on measuring a student's under-achievement by an IQ/achievement discrepancy measure, which essentially looks at the difference between academic achievement and perceived intellectual ability. Many commentators have criticized this approach to identifying learning disabilities. The primary concern is that it operates on a "waiting to fail" model, whereby students must manifest a few years of poor performance before their learning troubles will be identified and then addressed. Another problem is that poor achievement is a function of many factors that may be redressible by means besides the placement of the student in the special education system. These factors include, but are not limited to, poor instruction, lack of parental support, lack of effort or motivation on the part of the student, or simply poor testing ability by the student. All of these factors do not point necessarily to a "disability" that requires special education to be accommodated, but rather to learning problems held by many students.

The most common, specific learning disability found is that of reading disabilities, often dyslexia. Beyond reading difficulties, federal regulations call for disabilities that appear in a variety of areas, which are all reflected in the Wisconsin eligibility criteria. In Wisconsin, specific learning disability is defined by the DPI as:

> a severe learning problem due to a disorder in one or more of the basic psychological processes involved in acquiring, organizing or expressing information that manifests itself in school as an impaired ability to listen, reason, speak, read, write, spell or do mathematical calculations, despite appropriate instruction in the general education curriculum. Specific learning disability may include conditions such as perceptual disability, brain injury, minimal brain dysfunction, dyslexia and developmental aphasia.[42]

IEP teams inquiring into the existence of this disability must base their assessments on a variety of qualitative and quantitative measures, but the weight given to any particular measure or measures is unspecified.[43]

An IEP team is supposed to identify a child as having a learning disability only if three specific types of disability manifestations *all* exist at the time of initial identification. The first concern is with a child's ***classroom achievement***. Evaluators must inspect whether "the child's ability to meet the instructional demands of the classroom and to achieve commensurate with his or her age and ability levels is severely delayed" in the areas of either listening or reading comprehension, oral or written expression, basic reading skill, or mathematical calculation/reasoning.[44]

The second concern revolves around whether there is a ***significant discrepancy*** between a child's academic achievement in any of the areas just discussed and a child's intellectual ability. The latter "ability" factor is determined by the child's composite score on a multiple-score instrument or the child's score on a single score instrument. The IEPteam may base a determination of significant discrepancy only upon the results of individually administered, standardized achievement and ability tests that are reliable and valid. A significant discrepancy means "a difference between standard scores for ability and achievement equal to or greater than 1.75 standard errors of the estimate below expected achievement, using a standard regression procedure that accounts for the correlation between ability and achievement measures."[45] Under certain circumstances, which involve doubt as to validity and reliability, this regression procedure does not need to be strictly followed.[46]

The final matter required to be considered is whether a "child has an ***information processing deficit*** that is linked to the child's classroom achievement delays" under the two prior concerns.[47] According to the DPI, "[a]n information processing deficit means a pattern of severe problems with storage, organization, acquisition, retrieval, expression, or manipulation of information rather than relative strengths and weaknesses."[48] It is important to note that impairments to a student's learning capacity caused by any of the other disabilities identified under the law will not cause the student to be deemed learning disabled; rather he or she will be identified according to that other impair-

ment.[49] Finally, "If a child with a specific learning disability performs to generally accepted performance expectations in the general education classroom without specially designed instruction, the IEPteam shall determine whether the child is no longer a child with a disability."[50] This formulation of the rule may easily result in unnecessary continued placement of students in learning disabled programs because it fails to recognize that specially designed instruction can be achieved in regular classes.

The DPI's attempt to establish sound eligibility criteria for a child's placement as learning disabled is not without significant benefit in directing the focus that should be made in determining whether a child is learning disabled. Moreover, the federal definition of learning disabilities is not very descriptive to help guide the state. Nevertheless, the expressed criteria fail to adequately impose a uniform system of assessing learning disabilities across various district IEPteams. The preceding guidance for when children are properly to be placed in special education on the basis of learning disabilities carries significant problems. According to a recent comprehensive report on special education entitled *Rethinking Special Education for a New Century*, published jointly by the Thomas B. Fordham Foundation and the Progressive Policy Research Institute, "many of the persistent difficulties in developing valid classifications and operational definitions of LD are due to reliance on inaccurate assumptions about causes and characteristics of the disorders."[51] These authors contend that early reading and other sound intervention programs in regular education during early grades can help reduce the number of students identified as learning disabled — students who once they are placed as learning disabled tend to never leave this disability group. The authors also chide the present emphasis of using specialized services toward determination of eligibility based on the unexpected achievement method, rather than addressing the reason for the "unexpected" achievement in the first place.

Moreover, state law mandates that children may not be deemed in need of special education solely due to the fact the child has received insufficient teaching or because of the child's socio-economic background. According to the Code, "The IEPteam may not identify a child as having a specific learning disability if it determines that the significant discrepancy between ability and achievement *is primarily due to environmental, cultural or economic dis - advantage* or any of the reasons specified under [section] 115.782(3)(a), Stats. . . ."[52] The reference to section 115.782(3)(a) is primarily to the equally interesting requirement that the IEPteam "may not determine that a child is a child with a disability solely because the child has received insufficient instruction in reading or math or because the child has limited proficiency in English."[53] The insertion of this provision is significant, as it suggests that poor teaching cannot form the basis for children being identified as in need of special education. This stipulation makes intuitive sense, for if the provision of teaching for a certain set of students was so poor that, for example, most students in that teacher's class eventually become assessed as "learning disabled," this would be a serious indictment of that teacher's capabilities, not of the students'abilities. In fact, the DPI's basic definition of learning disabled, quoted earlier, assumes that the disability arose "despite appropriate instruction in the general education curriculum."

These two caveats, if not expressly, at least implicitly represent a concern on the part of education policy-makers to not allow either inadequate instruction or a student's social background to cause a student's identification as in need of special education. However, one must inspect the precise choice of words used within these eligibility criteria and restrictions to understand their truly weak limits on subjective determinations by those assigned the task of determining a child's need for special education. For example, notice that one restriction is qualified in that the significant discrepancy must not be *primarily due* to these socio-economic factors. This means that socio-economic factors may play a significant, while not the primary role in determining why an achievement discrepancy exists.

Furthermore, it is doubtful that many districts'IEPteams truly feel constricted by these limitations. There always remains a level of plausible explanations for the placement of many students. As a result, there is a legitimate fear that students categorized as learning disabled are, in part, composed of students that were poorly taught early on and as a result were left behind.

Statewide Variation

Given these definitional concerns with the proper identification of students as learning disabled, it is perhaps not surprising that there is great variation across the state in terms of the percentage of districts'students who are identified as learning disabled.

The one-hundred largest districts in the state had 34,282 students identified as learning disabled in 2000-01. They comprised 65% of the state's total learning disabled population that year. As learning disability is the primary impair-

ment that qualifies students for special education, it is not surprising that most districts have the greatest percentage of disabled students falling within this category. This reality is caused in part by the category's catch-all nature and that it most often captures students who are generally similar to regular students, yet who have some significant troubles learning or achieving in the classroom. Therefore, these students often could just as easily be found back among the 87% or so of students who are still in regular education. It is important to remember that these students are not cognitively disabled (mentally retarded); they are merely poor learners, as defined under the criteria just discussed.

Table 13 shows the ten districts, among the 100 largest districts in the state, with the highest and lowest percentage of total students in the district who have been classified as possessing a learning disability. Statewide most districts identify just under 5% of their total student population as learning disabled, irrespective of how many of the remaining 95% are placed in other special education disability categories. This means that approximately one-in-twenty of an average district's students are deemed to satisfy all of the requirements discussed above to allow placement in special education as learning disabled. Yet districts vary greatly in this percentage, with about 35% of districts having either more than 6.0% or less than 3.5% students listed as learning disabled, if assuming a normal distribution. The top districts have over 6% of their students identified as learning disabled, with four districts having over 7% of all their students identified as learning disabled. An amazing one out of twelve of the students in the Sauk Prairie and Beloit School Districts are called learning disabled. On the other side of the spectrum are the Whitefish Bay School District, with only 1.41% of its students identified as learning disabled, and eight other districts with between 2% and 3%.

Table 14 shows variations between districts in terms of the percentage of *disabled students* who are listed as learning disabled. Since learning disabilities are the most prevalent disability in special education in the state, many districts have a significant percentage of disabled students in this group. Seven districts have more than 50% of disabled students identified as learning disabled, which is above the district average of 41.6%; meanwhile, three districts have fewer than 30% of their disabled students listed as learning disabled.

TABLE 13 PERCENTAGE OF TOTAL STUDENTS IDENTIFIED AS LEARNING DISABLED IN 2000-01
AMONG 100 LARGEST SCHOOL DISTRICTS BASED ON STUDENTS ENROLLED

Highest Percentage of Students with Learning Disabilities	Percentage (Number)		Lowest Percentage of Students with Learning Disabilities	Percentage (Number)
Sauk Prairie	8.31 (232)		Whitefish Bay	1.41 (56)
Beloit	8.10 (600)		Wauwatosa	2.18 (208)
Monroe	7.86 (223)		Whitnall	2.42 (97)
Rice Lake Area	7.49 (217)		Manitowoc	2.45 (189)
Antigo	6.72 (237)		Mequon-Thiensville	2.48 (126)
Madison Metropolitan	6.50 (1909)		De Pere	2.63 (89)
Janesville	6.39 (783)		Elmbrook	2.80 (308)
Fond du Lac	6.34 (595)		West Bend	2.82 (256)
Waupun	6.33 (178)		Greenfield	2.88 (104)
Cudahy	6.18 (201)		Onalaska	3.05 (100)

Average across districts: 4.76% Median across districts: 4.85% Standard Deviation: 1.26

Emotionally Disabled

One of the disability categories recognized under special education law that is most open to wide-ranging ascription of meaning is the terribly nebulous "emotionally disabled" category, now technically referred to in Wisconsin as "emotional disturbance" or "emotional behavioral disabilities."

TABLE 14 PERCENTAGE OF DISABLED STUDENTS IDENTIFIED AS LEARNING DISABLED IN 2000-01
AMONG 100 LARGEST SCHOOL DISTRICTS BASED ON STUDENTS ENROLLED

Highest Percentage of Disabled Students with Learning Disabilities	Percentage (Number)		Lowest Percentage of Disabled Students with Learning Disabilities	Percentage (Number)
Rice Lake Area	57.11 (217)		Whitefish Bay	28.87 (56)
Wausau	55.15 (632)		Manitowoc	29.67 (189)
Sauk Prairie	53.95 (232)		De Pere	29.77 (89)
Slinger	53.57 (165)		Chippewa Falls Area	31.16 (186)
Hortonville	52.83 (168)		West Bend	31.88 (256)
Waunakee Community	52.33 (180)		Milton	32.05 (100)
Fond du Lac	51.29 (595)		Sun Prairie Area	32.32 (234)
West Allis	49.49 (628)		Rhinelander	32.68 (116)
Antigo	49.48 (237)		Wauwatosa	32.76 (208)
Beaver Dam	48.10 (241)		Greenfield	32.91 (104)

Average across districts: 41.63% Median across districts: 41.94% Standard Deviation: 6.08

Meaning of this Disability?

Originally, this disability category was meant to address students with severe emotional depression and suicidal tendencies. The concern now is that this category of special education has become a repository for students who are simply disruptive or socially maladjusted. Yet, it was not intended to be a disciplinary program for disruptive children. In fact, current federal law states that eligibility criteria for emotionally disabled *may not* include bad behavior, even if based on drug use or other delinquency. Moreover, the federal term for this group is "serious emotional disability,"[54] with the modifier "serious" suggesting a greater sensitivity to not including mere "problem children."

The state DPI has attempted to define emotional disability in a manner that conforms to some semblance of being scientifically based. According to DPI regulations, as promulgated in the Wisconsin Administrative Code for Public Instruction, emotional behavioral disability "means social, emotional or behavioral functioning that so departs from generally accepted, age appropriate ethnic or cultural norms that it adversely affects a child's academic progress, social relationships, personal adjustment, classroom adjustment, self-care or vocational skills."[55] On its face, the language of this definition is ripe for overly subjective determinations, both in terms of its general application as a district policy and also in how it may apply to any particular child or sets of children.

The Code does attempt to further articulate the criteria that should ostensibly limit these highly subjective determinations by district IEP teams. The Code states:

> (b) The IEP team may identify a child as having an emotional behavioral disability if the child meets [this] definition [ ] and meets all of the following:
>
> 1. The child demonstrates severe, chronic and frequent behavior that is not the result of situational anxiety, stress or conflict.
> 2. The child's behavior described under [the definition of emotional behavioral disability] occurs in school and in at least one other setting.
> 3. The child displays any of the following:
>
> a. Inability to develop or maintain satisfactory interpersonal relationships.
> b. Inappropriate affective or behavior response to a normal situation.
> c. Pervasive unhappiness, depression or anxiety.
> d. Physical symptoms, pains or fears associated with personal or school problems.
> e. Inability to learn that cannot be explained by intellectual, sensory or health factors.

> f. Extreme withdrawal from social interactions.
>
> g. Extreme aggressiveness for a long period of time.
>
> h. Other inappropriate behaviors that are so different from children of similar age, ability, educational experiences and opportunities that the child or other children in a regular or special education program are negatively affected.[56]

An IEPteam is directed to base its conclusions with regard to these criteria on whatever information is available, but primarily on "systematic observations" of children at issue.[57]

Again, as with the learning disability criteria, the considerations for emotional disturbance appear terribly over-inclusive. The factors listed under sub (b)(3) would seem to apply to a majority of middle school students, given the common physiological and social pressures experienced at those ages.

Moreover, there are no objective measures of these criteria, which may suggest a tendency for districts to make mere relative comparisons between students. In other words, districts may find some percentage of their student body that is the most disruptive, for whatever reason, as properly in need of being labeled as emotionally disabled, even though this same set of students, if in another district in which more students tend to be disruptive, would not be so placed. In other words, misbehavior is in the eye of the beholder and naturally tends to be evaluated in a relative fashion. Take, for example, a class of twenty students in which nineteen are well-behaved, and one tends to slip in a mild profanity in his speech with other students. Now place that same student in a second class in which his only misbehavior remains the mild use of profanity, but where half of his fellow students engage in extremely violent actions against each other. One would hardly be surprised to find that same student to be more likely labeled as emotionally disturbed in the first school setting than the second, even though his behavior is the same in both instances. Nonetheless, sub (b)(3)(h) seems to expressly allow this type of relative and subjective comparison if the measure of what is "similar" is based on within-district comparisons instead of objective measures of age-appropriate behavior for *all* children at that age.

To even further complicate matters, under Wisconsin law IEP teams are barred from using certain sociological considerations as the basis of classifying a students as emotional disabled. According to the Administrative Code:

> The IEP team may not identify *or refuse to identify* a child as a child with an emotional behavioral disability solely on the basis that the child has another disability, *or is socially maladjusted, adjudged delinquent, a dropout, chemically dependent, or a child whose behavior is primarily due to cultural deprivation, familial instability, suspected child abuse or socio-economic circumstances*, or when medical or psychiatric diagnostic statements have been used to describe the child's behavior.[58]

This concern echoes the language discussed above regarding the restriction from identifying any student for special education based on environmental or cultural disadvantage. Disabilities based on emotional disturbance should be based on severe misbehavior that has a cause properly assignable to some factor beyond the control of children, parents, or school staff. While the factors listed in the Code may not be considered openly, they still may animate the actions of special education evaluation teams.

Unfortunately, the Wisconsin criteria deviate from the federal criteria in a meaningful way that may allow for an over-identification of emotional disabilities. Under the federal regulations, emotional disturbance "does not apply to children who are socially maladjusted, *unless* it is determined that they have an emotional disturbance."[59] This construction differs from the Wisconsin code, which expressly states not only that these social problems *may not be used* to identify, but also that they *can not be used to refuse to identify*. Although subtle, the Wisconsin language carries less caution against evaluators being inclined to use students' personal problems, unrelated to any actual disability being possessed by the child, as a basis to place them in special education as emotionally disabled.

Specific attention must be addressed to the emotional disability category. The criteria of this category carry a high potential for abuse or misuse. As was exhibited in Table 12, 16,565, or 13.2%, of all disabled students in the state in 2000-01 were classified with their primary disability being emotionally disturbed, which is the third largest discrete, disability category, well behind the most-common "learning disabled" and "speech/language" groups. Given this significance, and the increasing rate of students identified as emotionally disturbed, a closer inspection must be made as to what students are being labeled as emotionally disturbed, and why. The DPI has been making strides in attempting to devise a more exacting guide for evaluating emotional disturbances.[60] Nonetheless, what seems lacking is a clear clinical basis for a student's placement in this group.

Moreover, attention to the relatively large incidence of students classified as emotionally disturbed is important because the ability of districts to discipline these students is severely restricted as compared to regular students. All students placed in special education are accorded different disciplinary protections from regular students, in that schools may not generally discipline special education students to the same standards or through the same process as regular students. Granted, amendments to the IDEA in 1997 eliminated the law's "stay-put" provision, which had restricted teachers from removing disabled children from school unless there was parental consent or a court order, and replaced it with language allowing suspensions and expulsions for these students if they violate a school disciplinary code with behavior unrelated to their disabilities. Nonetheless, these protections remain and limit the options of school staff to deal with potentially destructive students. These protections are especially pertinent with respect to emotionally disabled children who, by the definition of their disability, are prone to disruptive manifestations of their emotionally disturbed personality.

Statewide Variation

As with identification by learning disabilities, the prevalence of emotionally disabled students across districts varies considerably. The one-hundred largest districts in the state had 11,071 students identified as emotionally disabled in 2000-01, which comprised 67% of the state's total emotionally disabled population. A couple of specific observations should be noted. Amazingly, in the Ashland and Ashwaubenon school districts, one-out-of-four students in special education are in these programs because they are emotionally disabled. Second, there appears to be little correlation between these percentages and whether districts are rural or urban, have low or high socio-economic standing, or where in the state the districts are located. The exception to the point on geography is that many of the districts with the lowest percentage of emotionally disabled students are in the Milwaukee area. Still, we see both relatively affluent districts (e.g., Elmbrook) and relatively less-affluent districts (e.g., South Milwaukee) among these Milwaukee suburbs. Other similarities and differences can be discerned in Tables 15 and 16 for the 100 largest districts, with results for all districts in Appendix B.

TABLE 15 PERCENTAGE OF TOTAL STUDENTS IDENTIFIED AS EMOTIONALLY DISABLED IN 2000-01
AMONG 100 LARGEST SCHOOL DISTRICTS BASED ON STUDENTS ENROLLED

Highest Percentage of Students with Emotional Disabilities	Percentage (Number)		Lowest Percentage of Students with Emotional Disabilities	Percentage (Number)
Ashland	3.53 (87)		Whitefish Bay	0.51 (20)
Ashwaubenon	3.44 (113)		Whitnall	0.65 (26)
Green Bay Area	2.90 (729)		Elmbrook	0.69 (76)
De Forest Area	2.70 (83)		Hamilton	0.73 (33)
Stoughton Area	2.65 (105)		Wauwatosa	0.79 (75)
Cudahy	2.65 (86)		Mequon-Thiensville	0.81 (41)
Hudson	2.62 (122)		South Milwaukee	0.82 (35)
Baraboo	2.57 (88)		Delavan-Darien	0.93 (30)
Monroe	2.54 (72)		Oak Creek-Franklin	0.94 (35)
Beloit	2.42 (179)		Kimberly Area	0.94 (52)

Average across districts: 1.57% Median across districts: 1.52% Standard Deviation: 0.58

TABLE 16 PERCENTAGE OF DISABLED STUDENTS IDENTIFIED AS EMOTIONALLY DISABLED IN 2000-01
AMONG 100 LARGEST SCHOOL DISTRICTS BASED ON STUDENTS ENROLLED

Highest Percentage of Disabled Students with Emotional Disabilities	Percentage (Number)		Lowest Percentage of Disabled Students with Emotional Disabilities	Percentage (Number)
Ashland	26.44 (87)		Middleton-Cross Plains	8.08 (56)
Ashwaubenon	23.64 (113)		South Milwaukee	8.52 (35)
Green Bay Area	20.39 (729)		Delavan-Darien	8.60 (30)
Greendale	20.00 (46)		Rice Lake Area	8.68 (33)
Baraboo	19.86 (88)		Hamilton	8.78 (33)
Sheboygan Area	19.81 (295)		Sauk Prairie	8.84 (38)
Cudahy	19.63 (86)		Verona Area	8.98 (45)
Hudson	19.49 (122)		Merrill Area	9.19 (42)
De Forest Area	18.65 (83)		Elmbrook	9.23 (76)
De Pere	18.39 (55)		Kimberly Area	9.23 (35)

Average across districts: 13.64% Median across districts: 13.28% Standard Deviation: 3.48

Other Disability Categories

Beyond students labeled with learning disabilities and emotional disabilities are those special education students who are labeled as impaired within the criteria of one or more of the eight other impairment categories specified by the statutes. This report refrains from performing an inspection of the eligibility criteria for each of these groups for two primary reasons. First, the criteria for these categories, while not completely free from discretionary abuse, are nonetheless much more concrete in terms of scientifically and objectively identifying true disabilities. Second, the percentage of students identified into these groups has, with the exception of some low-incidence disabilities (such as Autism, Significant Developmental Delay, and Other Health Impairment), remained relatively constant in the past decade. Nevertheless, it is helpful to further understand and appreciate the evident variation in how districts identify students even within these disability groups, to present a more complete understanding as to the wide range across Wisconsin school districts in special education policies on identification by all disability types.

Cognitive disabilities represent one of the more traditional disability categories that special education was originally designed to address. This group of students is composed of those who suffer from some form of mental retardation. Statewide, 13,358 (1.71%) students were classified as cognitively disabled in 2000-2001. The one-hundred largest districts in the state had 9,407 students identified as cognitively disabled in 2000-01, which represents approximately 70% of the state's total population of cognitively disabled students. Among these districts, the high and low rankings for the percentage of total students identified as cognitively disabled in 2000-01 are shown in Table 17. Alternatively, the percentage of disabled students within a district who are identified as cognitively disabled for that school year are shown in Table 18 for those districts with the highest and lowest percentages.

Speech and language impairments are the second-most-prevalent impairment category in Wisconsin behind learning disabilities. Students possessing these disabilities are those who have communication disorders that adversely affect their educational performance.[61] Interestingly, Wisconsin's definition is slightly broader than federal regulations, in that these impairments will be seen to require special education not only if the disorder affects a student's academic performance, but also if affects only a student's social, emotional, or vocational development.[62]

Statewide, 27,402 (2.67%) students were classified as speech or language impaired in 2000-01. It is important to recall the phenomenon noted by the discussion of Table 12's Child Count in that the number of students identified with this disability is significantly greater for younger students (those less than 11 years old) than for older students.

TABLE 17 PERCENTAGE OF TOTAL STUDENTS IDENTIFIED AS COGNITIVELY DISABLED IN 2000-01
AMONG 100 LARGEST SCHOOL DISTRICTS BASED ON STUDENTS ENROLLED

Highest Percentage of Students with Cognitive Disabilities	Percentage (Number)		Lowest Percentage of Students with Cognitive Disabilities	Percentage (Number)
Beloit	2.82 (209)		Whitefish Bay	0.20 (8)
Sparta Area	2.29 (70)		Mequon-Thiensville	0.31 (16)
Wisconsin Rapids	2.23 (162)		Elmbrook	0.35 (38)
Milwaukee	2.09 (2571)		Whitnall	0.37 (15)
Reedsburg	2.05 (59)		Wauwatosa	0.40 (38)
Waupun	2.03 (57)		Hamilton	0.40 (18)
Monroe	2.01 (57)		Greendale	0.42 (13)
Tomah Area	1.95 (70)		Franklin Public	0.44 (19)
Two Rivers	1.85 (48)		Shorewood	0.46 (12)
Stoughton Area	1.84 (73)		Muskego-Norway	0.47 (24)

Average across districts: 1.14% Median across districts: 1.11% Standard Deviation: 0.51

TABLE 18 PERCENTAGE OF DISABLED STUDENTS IDENTIFIED AS COGNITIVELY DISABLED IN 2000-01
AMONG 100 LARGEST SCHOOL DISTRICTS BASED ON STUDENTS ENROLLED

Highest Percentage of Disabled Students with Cognitive Disabilities	Percentage (Number)		Lowest Percentage of Disabled Students with Cognitive Disabilities	Percentage (Number)
Tomah Area	19.55 (70)		Whitefish Bay	4.12 (8)
Wisconsin Rapids	19.38 (162)		Mequon-Thiensville	4.22 (16)
Manitowoc	18.37 (117)		Muskego-Norway	4.39 (24)
Sparta Area	18.28 (70)		Pulaski Community	4.48 (21)
Watertown	16.56 (106)		Elmbrook	4.62 (38)
Delavan-Darien	16.05 (56)		Portage Community	4.70 (18)
Milwaukee	15.94 (2571)		Hamilton	4.79 (18)
De Pere	15.72 (47)		Franklin Public	4.79 (19)
River Falls	15.63 (55)		Middleton-Cross Plains	4.91 (34)
Superior	15.54 (101)		Cudahy	5.02 (22)

Average across districts: 9.89% Median across districts: 9.60% Standard Deviation: 3.85

The one-hundred largest districts in the state had 18,415 students identified as speech or language disabled in 2000-01, which is 67% of the state's total population of speech and language disabled students. Among these districts, the high and low rankings for the percentage of total students identified as speech and language disabled in 2000-01 are shown in Table 19. Alternatively, the percentage of disabled students identified as speech or language disabled that school year are shown in Table 20.

It is interesting to note that many of the districts with the greatest percentage of total students found with speech or language impairments are in the Madison area. While those districts with the lowest percentages of students appear

TABLE 19 PERCENTAGE OF TOTAL STUDENTS IDENTIFIED AS SPEECH & LANGUAGE DISABLED IN 2000-01
AMONG 100 LARGEST SCHOOL DISTRICTS BASED ON STUDENTS ENROLLED

Highest Percentage of Students with Speech & Language Disabilities	Percentage (Number)		Lowest Percentage of Students with Speech & Language Disabilities	Percentage (Number)
Sun Prairie Area	4.38 (234)		Elmbrook	1.48 (163)
De Forest Area	4.26 (131)		Wausau	1.55 (167)
Monroe	4.16 (118)		Watertown	1.62 (97)
Beloit	4.12 (305)		Greendale	1.67 (52)
Middleton-Cross Plains	3.84 (206)		West De Pere	1.69 (39)
Portage Community	3.82 (110)		Rice Lake Area	1.72 (50)
Milton	3.71 (111)		Hortonville	1.72 (58)
Monona Grove	3.69 (108)		Wisconsin Rapids	1.73 (126)
Oshkosh Area	3.64 (453)		Waupaca	1.74 (51)
Racine	3.58 (927)		Sparta Area	1.77 (54)

Average across districts: 2.63% Median across districts: 2.55% Standard Deviation: 0.66

TABLE 20 PERCENTAGE OF DISABLED STUDENTS IDENTIFIED AS SPEECH & LANGUAGE DISABLED IN 2000-01
AMONG 100 LARGEST SCHOOL DISTRICTS BASED ON STUDENTS ENROLLED

Highest Percentage of Disabled Students with Speech & Language Disabilities	Percentage (Number)		Lowest Percentage of Disabled Students with Speech &Language Disabilities	Percentage (Number)
Whitefish Bay	42.78 (83)		Rice Lake Area	13.16 (50)
Milton	35.58 (111)		Sparta Area	14.10 (54)
Grafton	34.59 (92)		Cudahy	14.16 (62)
Wauwatosa	33.70 (214)		Baraboo	14.45 (64)
West Bend	33.37 (268)		Wausau	14.57 (167)
Oak Creek-Franklin	33.33 (184)		Wisconsin Rapids	15.07 (126)
Shorewood	32.80 (62)		Watertown	15.16 (97)
Sun Prairie Area	32.32 (234)		West De Pere	15.92 (39)
Rhinelander	31.27 (111)		Madison Metropolitan	16.08 (708)
Hamilton	31.12 (117)		Green Bay Area	16.59 (593)

Average across districts: 23.59% Median across districts: 22.73% Standard Deviation: 5.66

all across the state. The apparent correlation between district rates of identifying speech disabilities and proximity to Madison may be a factor of the larger supply of speech therapists being generated in that area by the UW-Madison's Speech Pathology graduate program, with the school labor market adjusting to accommodate that local demand.

A final category to inspect is a residual group of what are termed as "***low-incidence" disabilities***. Under the DPI Special Education Reports, low-incidence disabilities are defined as those disabilities of Other Health Impairment,

TABLE 21 PERCENTAGE OF TOTAL STUDENTS IDENTIFIED WITH LOW-INCIDENCE DISABILITIES* IN 2000-01
AMONG 100 LARGEST SCHOOL DISTRICTS BASED ON STUDENTS ENROLLED

Highest Percentage of Students with Low-Incidence Disabilities	Percentage (Number)		Lowest Percentage of Students with Low-Incidence Disabilities	Percentage (Number)
Milwaukee	2.80 (3445)		D.C. Everest Area	0.31 (18)
Verona Area	2.78 (121)		Shorewood	0.38 (10)
Madison Metropolitan	2.78 (816)		Oshkosh Area	0.41 (51)
Green Bay Area	2.55 (641)		Wisconsin Rapids	0.48 (35)
Oconomowoc Area	2.20 (112)		Greendale	0.51 (16)
Elmbrook	2.16 (237)		Reedsburg	0.59 (17)
Stoughton Area	2.09 (83)		Oak Creek-Franklin	0.65 (36)
Cudahy	2.06 (67)		Fond du Lac	0.67 (63)
Middleton-Cross Plains	1.99 (107)		Whitefish Bay	0.68 (27)
New Richmond	1.98 (51)		Grafton	0.69 (19)
Average across districts: 1.26%		Median across districts: 1.21%		Standard Deviation: 0.51

** Low-incidence Disabilities are defined as those disabilities of Other Health Impairment, Orthopedic Impairment, Autism, Visual Impairment, Hearing Impairment, Deaf-Blind, Traumatic Brain Injury, and Significant Developmental Delay. In addition, the Low Incidence category may include the disabilities of Cognitive Disability, Emotional Disturbance, Learning Disability, and Speech or Language Impairment when the identified student count is five or fewer students for these disabilities in any particular district.*

Orthopedic Impairment, Autism, Visual Impairment, Hearing Impairment, Deaf-Blind, Traumatic Brain Injury, and Significant Developmental Delay. In addition, however, any particular district's Low Incidence category may include the disabilities of Cognitive Disability, Emotional Disturbance, Learning Disability, and Speech or Language Impairment when the identified student count for that disability in the district is five or fewer students. Because of this last qualification, the Reports do not provide a statewide percentage for low-incidence disabilities. Nonetheless, summing the other groups from the 2000-2001 Child Count, statewide, 15,280 students were classified within these other "low-incidence" groups. The one-hundred largest districts in the state had 11,417 students identified as low-incidence in 2000-01, which is 74% of the state's total population of students with "low-incidence" impairments. Again, this percentage is slightly inflated since a portion of the 11,417 includes students with either learning, cognitive, emotional, or speech and language disabilities, if a district had five or fewer students with any of those disabilities. Among these larger districts, the high and low rankings for the percentage of total students identified as disabled with these low-incidence impairments in 2000-01 are shown in Table 21. In addition, the percentage of disabled students identified as cognitively disabled that school year are shown in Table 22.

Summary

Notably wide variations exist across state school districts in how they handle special education decisions. This phenomenon is especially acute with those impairments that are not identified by means of precise, objective criteria but are instead the product of artful determinations by human actors in the process — namely learning disabled and emotionally disabled.

This evident variation should not necessarily be construed as a need for a more specific and limited system, with more exacting, state-determined, diagnosis criteria that restricts districts from being able to determine who among their students are disabled. It is highly doubtful that the science exists to guide the creation of such criteria. Rather, it is meant to show how utterly subjective the process for identifying students by particular disabilities is, and that it

TABLE 22 PERCENTAGE OF DISABLED STUDENTS IDENTIFIED WITH LOW-INCIDENCE DISABILITIES* IN 2000-01
AMONG 100 LARGEST SCHOOL DISTRICTS BASED ON STUDENTS ENROLLED

Highest Percentage of Disabled Students with Low-Incidence Disabilities	Percentage (Number)		Lowest Percentage of Disabled Students with Low-Incidence Disabilities	Percentage (Number)
Elmbrook	28.80 (237)		D.C. Everest Area	2.83 (18)
Verona Area	24.15 (121)		Oshkosh Area	3.40 (51)
Milwaukee	21.36 (3445)		Wisconsin Rapids	4.19 (35)
Mequon-Thiensville	21.11 (80)		Reedsburg	4.33 (17)
Madison Metropolitan	18.54 (816)		Monroe	5.05 (25)
Whitnall	17.98 (48)		Shorewood	5.29 (10)
Green Bay Area	17.93 (641)		Waupun	5.38 (20)
Cedarburg	17.77 (59)		Fond du Lac	5.43 (63)
Oconomowoc Area	17.20 (112)		Beaver Dam	5.99 (30)
Waupaca	16.23 (49)		Beloit	6.51 (90)

Average across districts: 11.25% Median across districts: 10.58% Standard Deviation: 4.35

** Low-incidence Disabilities are defined as those disabilities of Other Health Impairment, Orthopedic Impairment, Autism, Visual Impairment, Hearing Impairment, Deaf-Blind, Traumatic Brain Injury, and Significant Developmental Delay. In addition, the Low Incidence category may include the disabilities of Cognitive Disability, Emotional Disturbance, Learning Disability, and Speech or Language Impairment when the identified student count is five or fewer students for these disabilities in any particular district.*

is necessarily so, regardless of the criteria developed. The alternative recommendation would be a lessening of the overall emphasis on the labeling of students in need by these discrete categories. The federal law simply does not mandate this elaborate set of diagnostic criteria that are employed in Wisconsin.

INCIDENCE OF RACIAL MINORITIES RECEIVING SPECIAL EDUCATION SERVICES

Another particularly interesting, yet terribly sensitive sub-issue with the concern about the over-identification of students into special education is that of how students from different social and ethnic backgrounds are treated within the identification process. Unfortunately, the data on this issue often raise more questions than they answer. Nevertheless, the presentation of these data must be made to spark an informed and intelligent discussion of why some minorities have an over-representation in special education, and why some districts in the state are much more pronounced in that disparity.

National Trends and Issues

Attention has been growing with respect to the apparent over-incidence of certain minority students within special education. Although it has been known for years that minorities seem to be placed disproportionately in special education, a few national reports in recent years have brought attention to the apparently disproportionate identification of minority students, particularly black students, into special education.

The first set of findings grew out of a conference conducted by the Civil Rights Project at Harvard University in November of 2000 and were based on 1997 data from the Department of Education. The findings, disseminated through four, currently unpublished research papers prepared for the conference,[63] found that black students were three times more likely than white students to be labeled mentally retarded (cognitively disabled, in Wisconsin parlance), were two times more likely to be identified with an emotional disability problem, and were 1.3 times more

likely to be identified with a learning disability. The reports' authors also noted that the higher incidence of blacks being identified as mentally retarded was more pronounced in wealthier school districts. Finally, the authors noted a concern that black children were still less likely to get the help they needed to maintain sufficient academic progress.

A second report, commissioned by the United States Department of Education, was released in early 2002 by the National Research Council of the National Academy of Sciences (NRC) and augmented many of the findings from the Harvard study. The authors of this report showed that in 1999 (the most recent year that national data were available), approximately 15% of all black students, 13% of white, 16% of American Indian/Alaskan Native, 11% of Hispanic, and 6% of all Asian/Pacific Islander students were served in special education, as compared to an overall rate across all ethnic groups of about 12%.[64] They also concurred with the earlier Harvard study that black students have been disproportionately identified as mentally retarded and emotionally disturbed; however, the study notes that the magnitude of the disproportion in students identified as mentally retarded has been reduced over the past 25 years.[65] Likewise, while recognizing that, nationally, the learning disabled category is both the largest and fastest growing category, black, white, and Hispanic students were identified as learning disabled at roughly the same rate. Similarly, in terms of low-incidence disabilities, the data employed by the NRC showed no evidence that ethnic minorities were over-represented in these disability groups. Another interesting finding from the NRC report is that there is much greater variation across states in the probability of being identified as mentally retarded for black students than for any other race, although that overall probability has decreased since the 1970s. By contrast, for learning disabilities and emotional disturbances, the variations across states is roughly the same for each race (with the exception of Indians in the emotional disturbance category, which has much greater variation), although there appear to be a greater number of outliers for Indians and blacks in emotional disturbance identification.

One other analysis of the racial disparities in special education was recently made by two authors as part of the *Rethinking Special Education for a New Century* report.[66] These authors statistically examined district-level data in a few states and found "a common pattern of predominantly white schools placing minority students into special education at significantly higher rates than the national average."[67] Furthermore, these correlations continued even after controlling for such factors as school spending, student poverty levels, and community poverty rates. The authors then explored four hypotheses for explaining this finding, including 1) that minority-majority districts provide fewer special education services due to lack of resources; 2) urban districts are less competent in identifying special-needs students; 3) that minority parents attach more stigma to having their children placed in special education than white parents and therefore are less aggressive in pushing for referrals; and 4) conscious desires by schools for social segregation. The authors also note an interesting finding that, as the percentage of minority teachers in a school increases, special education rates, both for all students and for blacks, tend to decrease. The authors conclude by stating, "In all probability, there is likely no single overarching explanation that applies to all districts [for why minorities are identified for special education at a higher rate]. That fact that the special education process is glaringly impacted by race, however, surely warrants both concern and further research."[68]

The response from these and related findings has been one of concern and a need for action. One example of action is the recent publication by the National Alliance of Black School Educators of a guide entitled *Addressing Over-Representation of African American Students in Special Education: The Pre-referral Intervention Process, An Administrator's Guide*. It is meant to provide administrators with a general understanding of the issue, to describe promising approaches, and offer better suggestions for involving families, all of which are aimed at confronting potential problems with over-identification.

Overall, these findings suggest one of two conclusions (or some combination of both), each of which is troublesome. The first is that minorities, particularly blacks, are truly in greater need of special education services because a greater percentage of these students possesses disabilities that inhibit their educational development. If this is the case, then educators, administrators, and social and political policy-makers all must search to identify the causes for having students within these discrete demographics being disproportionately in need of special education. The second conclusion, similarly troubling, is that some school districts are labeling minorities as disabled at a much greater rate than other students due to factors that are not truly reflective of these students' mental or physical disabilities. In other words, the fear is that, in many school districts, the policies and processes by which students are referred to, and classified for, special education appear to significantly impact black students, and that some of the children are inappropriately determined to require special education when, in fact, they do not.

Special Education and Ethnicity in Wisconsin

One discovery of these recent national studies is that variations continue to exist across states in terms of the disproportionality in which students of different ethnic groups are placed and remain in special education. Some states have a much larger percentage of black versus white students in special education, while others offer little to no disparity. Moreover, states vary on the placement rates of blacks in special education across the different disabilities. According to the NRC study, there appears to be no discernable variable accounting for these differences. For example, when looking solely at mental retardation rates, states with relatively high rates of placing black students had student populations that are both largely composed of blacks (e.g., Alabama and Arkansas) and those with a lower composition of blacks (e.g., Massachusetts and Indiana).[69] Similarly, when looking at rates of learning disabilities, some of the states having a high prevalence of black students in this disability group are also those in which black students represent a large overall portion of the number of learning disabled students in the state (e.g., Delaware), while in other states this relation does not exist. There are many other examples of potential variables that may suggest greater rates of identification of minorities (e.g., geography, poverty rates, and more), but, as with those just mentioned, none of these variables present a completely predictable or known pattern of correlation, much less causation, for over-identification of minorities into special education.

How does Wisconsin fare on this issue? As for any correlations between a student's placement in special education and a student's racial minority status in Wisconsin, the following data present some intriguing, if not disturbing results. The statewide percentages of students identified as disabled within each ethnic group were: Asian (7.7%), black (18.9%), Hispanic (12.1%), Indian (18.6%), and white (14.2%).[70] In other words, of all the Asian students in Wisconsin in 2000-01, 7.7% percent were in special education that year, and so forth. These numbers, therefore, provide a type of benchmark percentage from which to weigh comparisons between districts. These numbers also show a higher prevalence for most ethnic groups than is seen by the national figures cited earlier.

Table 23 shows the raw frequency of students identified as special education, broken down by ethnicity, for the state's 25 largest districts based on total students (public and private) enrollment. These numbers include students attending private schools who are receiving services from the public school, yet only approximately 1.2% of all students in special education in Wisconsin in 2000-01 were served in private schools.[71] Only the top 25 largest districts were used, since most districts that are smaller in size have very few minority students. State confidentiality restrictions prevent the DPI from presenting demographic figures of any district if five or fewer (but more than zero) students fit that discrete demographic profile. Therefore, data cannot be presented or analyzed for districts that have five or fewer students in an ethnic group, as do most districts smaller than the top 25. As it is, even within the top 25 districts, many figures needed to be redacted and are noted as such.

Together, these twenty-five districts enrolled approximately forty-two percent of all students (public and private), forty percent of all public school students in Wisconsin,[72] and forty-three percent of all disabled students in the state during 2000-01.[73] The percentages of all state public school students enrolled in one of these twenty-five districts, by ethnicity, were: Asian (73.5%), black (89.2%), Hispanic (73.3%), Indian (27.1%), and white (30.6%).[74] Clearly, these districts serve a disproportionate number of the state's minority students, especially black children within Wisconsin. Finally, the percentages of the state's total number of disabled students within each ethnic group who are located in one of these twenty-five districts were: Asian (73.0%), black (91.7%), Hispanic (75.9%), Indian (25.0%), and white (32.1%).[75]

However, mere raw frequencies of students inform very little without comparing these figures to the number of overall students in each district by each ethnicity. Therefore, Table 24 shows the percentage of special education students in the state's 25 largest districts (based on total public and private student enrollment in the district) by race/ethnicity of the student. This figure, sometimes referred to as a "risk index,"[76] is calculated by dividing the number of students in a given ethnic group having been placed in special education (i.e., the figures located in the cells of Table 23) by the total public school enrollment for that ethnic group in the district.

By viewing the percentage of students of a particular ethnicity who are identified as disabled, and making comparisons based on these percentages, one can witness two different, but somewhat related occurrences. First, comparisons can be made *within districts* between ethnic groups and the overall percentage of students who are in special education. This type of comparison illuminates whether any district disproportionately identifies students of certain ethnicities as in need of special education, relative to students of other ethnicities in that district. In other words, regardless of whether a particular district tends overall to place a higher or lower percentage of students into special

TABLE 23 NUMBER OF STUDENTS IN SPECIAL EDUCATION BY ETHNICITY FOR WISCONSIN'S 25 LARGEST SCHOOL DISTRICTS, BASED ON ENROLLMENT OF PUBLIC & PRIVATE SCHOOL STUDENTS IN DISTRICT 2000-01 SCHOOL YEAR

School District	Asian	Black	Hispanic	Indian	White	Total
Milwaukee School District	246	10,846	1919	140	2977	16,128
Madison Metropolitan School District	230	1463	252	43	2414	4402
Racine School District	22	1343	371	14	1737	3487
Green Bay Area School District	161	109	170	252	2883	3575
Kenosha School District	22	578	308	16	1903	2827
Appleton Area School District	142	60	44	26	1752	2024
Waukesha School District	23	44	180	18	1419	1684
Eau Claire Area School District	79	*	*	*	1353	1449
Oshkosh Area School District	83	59	*	*	1323	1503
Sheboygan Area School District	135	39	131	19	1165	1489
Janesville School District	*	56	21	*	1595	1688
West Allis School District	14	82	49	12	1111	1268
Elmbrook School District	33	88	17	0	685	823
Wausau School District	201	17	*	*	911	1146
La Crosse School District	106	39	7	16	1024	1192
Wauwatosa School District	*	48	12	*	562	635
Fond du Lac School District	*	30	28	*	1088	1160
Stevens Point Area School District	58	*	16	*	941	1025
West Bend School District	*	*	17	*	775	803
Neenah School District	6	*	8	*	883	903
Manitowoc School District	35	*	*	0	587	637
Beloit School District	*	389	107	*	876	1383
Wisconsin Rapids School District	29	10	13	18	766	836
Watertown School District	0	0	0	0	640	640
Menomonee Falls School District	*	11	*	*	501	520
Totals for Top 25 Districts	**1625**	**15,311**	**3670**	**574**	**31,871**	**53,223**

Source: *The numbers of students with disabilities by ethnicity were provided from special data runs by the DPI, January and April 2002.*

** Symbolizes that five or fewer students (but more than zero) within this district were of that ethnicity and deemed disabled. For confidentiality purposes, therefore, the actual numbers were not provided for that field, nor could percentages be computed.*

Note: *The particular labels employed for each ethnicity group conform to those as reported by the DPI.*

education, one can determine if significant differences exist in the percentage of students by ethnicity. Second, *between-district* comparisons can be made to examine variations in the percentages of students by ethnicity who were identified as in need of special education.

TABLE 24 PERCENTAGE OF STUDENTS WITHIN ETHNIC GROUP IDENTIFIED AS DISABLED BASED ON ENROLLMENT OF PUBLIC STUDENTS IN DISTRICT FOR WISCONSIN'S TWENTY-FIVE LARGEST SCHOOL DISTRICTS

School District (total public student enrollment)	Asians	Blacks	Hispanics	Indians	Whites	All Students	Total Number of Disabled Students
Statewide (879,476)	**7.69**	**18.91**	**12.10**	**18.60**	**13.99**	**14.16**	**124,505**
Milwaukee (97,985)	5.76	18.20	12.96	14.89	16.20	16.46	16,128
Madison Metropolitan (25,087)	9.32	31.56	14.50	26.38	15.01	17.55	4402
Racine (21,102)	9.05	25.32	13.44	20.29	13.65	16.52	3487
Green Bay Area (20,104)	8.67	18.92	10.46	26.06	19.12	17.78	3575
Kenosha (20,099)	7.86	22.07	12.97	20.51	12.90	14.07	2827
Appleton Area (14,793)	9.61	28.85	11.14	28.57	13.88	13.68	2024
Waukesha (12,760)	9.06	18.64	15.06	19.15	12.92	13.20	1680
Eau Claire Area (11,268)	7.40	<3.62	<5.38	<5.32	13.70	12.86	1449
Oshkosh Area (10,738)	9.18	30.57	<2.58	<12.50	14.06	14.00	1503
Sheboygan Area (10,418)	7.78	23.21	15.92	27.14	15.29	14.29	1489
Janesville (10,758)	<2.51	14.14	7.22	<13.16	16.22	15.69	1688
West Allis (8,795)	7.14	19.16	11.84	8.51	14.59	14.42	1268
Elmbrook (7,415)	7.66	25.96	15.74	0.00	10.49	11.10	823
Wausau (9,015)	8.84	21.25	<5.75	<8.77	13.98	12.71	1146
La Crosse (7,775)	9.79	14.39	9.46	19.05	16.35	15.33	1192
Wauwatosa (7,114)	<1.33	5.50	5.56	<10.64	10.03	8.93	635
Fond du Lac (7,241)	<2.05	25.42	12.12	<16.13	16.44	16.02	1160
Stevens Point Area (7,871)	9.46	<7.14	8.74	<11.11	13.52	13.02	1025
West Bend (6,779)	<12.50	<12.50	12.88	<9.80	11.89	11.85	803
Neenah (6,608)	4.92	<7.25	6.40	<10.64	14.14	13.67	903
Manitowoc (5,619)	6.38	<7.46	<3.07	0.00	12.23	11.34	637
Beloit (6,880)	<6.67	20.28	13.34	<23.81	21.56	20.10	1383
Wisconsin Rapids (5,948)	7.92	29.41	17.81	24.66	14.18	14.06	836
Watertown (3,725)	0.00	0.00	0.00	0.00	19.18	17.18	640
Menomonee Falls (4,232)	<4.39	3.21	<4.95	<17.24	13.74	12.29	520
Total							**53,223**

Note: *The raw frequency of students identified as disabled includes both students in public schools and non-public schools that are receiving special education services. Unfortunately, at least for purposes of this data analysis, the DPI does not collect race/ethnicity data for children attending private schools. Rather, the private school enrollment collection only asks for a count of students by grade level and gender.*[77] *Therefore, the numbers for the district enrollment figures, both by ethnicity and by total students, used in Table 24 are only for public schools. Nevertheless, use of only the public schools figures on the number of students in each district by ethnicity should not significantly affect the percentages reported in Table 24 According to the DPI and the December 1, 2000 count of students with disabilities, of the 125,358 students with disabilities in Wisconsin schools in 2000-01, only approximately 1,521 (1.2%) of these students were reported as attending private schools.*[78] *Therefore, it is likely that the percentages provided are slightly inflated, but only to the extent that students identified as disabled are actually enrolled in non-public schools. In terms of cross-ethnicity or cross-district comparisons, however, there will only be a distortion to the extent the incidence of placement in non-public schools proportionally differs between district for any particular ethnic group.*

< *symbolizes that five or fewer students (but more than zero) within this district were of that ethnicity and deemed disabled. For confidentiality purposes, therefore, the actual numbers were not provided for that field, nor could percentages be computed. For purposes of this Table, the percentage given represents the maximum proportion of students in this ethnic group who could have been in special education; that is, if five students in that ethnic group were in special education. The actual percentage could be much lower, but is greater than zero.*

Sources*: The numbers of students with disabilities by ethnicity were provided from special data runs by DPI, January and April 2002. The numbers on total student enrollment by ethnicity were from* Basic Facts and Wisconsin's Elementary and Secondary Schools, Section C: Student and Staff Data by Educational Agency.

Note*: The particular labels employed for each ethnic group conform to those reported by the DPI.*

Within-District and Between-District Comparisons

Besides just viewing the disparities in percentage terms, the data from Table 24 have been further modified, as seen in Table 25, to present what are known as "odds ratios." These ratios, which were similarly employed in both the Harvard and the NRC studies on racial over-identification, are achieved by dividing a district's percentage of students in special education from a particular ethnic group (the cells in Table 24) by the same percentage of another ethnic group (here, that of white students).[79] If the percentage — therefore risk of being identified — is the same between the two ethnic groups in that district, then the ratio will equal 1.0. A ratio greater than 1.0 means that the particular ethnic group is more likely to be identified than white students. For example, Sheboygan's ratio for blacks of 1.52 shows that blacks in that district have a 52% greater likelihood of being in special education than white students in that district. Conversely, a number less than 1.0 means students of that ethnicity are less likely than white students to be in special education.

Both the within- and between-district comparisons of identification by ethnic group reveal some interesting findings. First, the statewide ratios and nationwide ratios (those used from both the NRC study [1997 data] and the Harvard Civil Right Project study [1999 data]) are provided for purposes of comparing any district's figures with those found based on aggregate state and national rates. With regard to only these measures, we immediately see that for all ethnic groups, the ratios are greater in Wisconsin than nationally according to the NRC figures, again, however, recognizing that the data upon which these two sets of ratios are derived represent different years. However, the Harvard figures show a higher ratio across the nation for blacks than in Wisconsin. The cause of the disparity between these two studies is uncertain.

Next, looking at the odds ratios in Table 25, we can see how each ethnic group fares across these 25 districts. Asian students are by far the least susceptible to being placed in special education, relative to white students, with none of the 19 known ratios exceeding 0.73 and the state ratio being only 0.55. Known odds ratios for Indian students are only available for 14 of the 25 districts. Not counting those ratios that equal zero due to the fact that no Indian students were in special education in those districts at the time of the 2000-01 child count, all of the ratios except Milwaukee and West Allis are greater than 1.0. The highest ratio is 2.06 in the Appleton School District, meaning that an Indian student in Appleton is more than twice as likely as his or her white peer to be found in special education programs. Overall, these districts appear to have a greater difference in identification between Indians and whites than what is witnessed nationally and in the average rate for the state as a whole.

Among Hispanic students, 20 districts have known odds ratios, with a majority (14) being less than 1.0. Those districts with the highest ratios between Hispanics and whites are Elmbrook, Kenosha, Waukesha, Sheboygan, and Wisconsin Rapids, with Elmbrook the highest at 1.50. The districts with the lowest ratio, signifying that whites were placed in special education to a greater proportion than Hispanics, were Janesville, Wauwatosa, Green Bay, and La Crosse. Overall, the figures for Hispanics seem to correspond well to the overall state ratio and the national ratio.

The ratios for black students present some of greatest disproportion — and concern. Twenty of the 25 districts have known odds ratios, with all of the five unknown ratios being at or below 1.0. Of the 20 districts, only five have a black-to-white ratio of less than 1.0, while another five have ratios greater than 2.0. These ratios, which are found in Appleton (2.08), Elmbrook (2.47), Madison (2.10), Oshkosh (2.17), and Wisconsin Rapids (2.07), show that black students in these districts are found in special education programs at a rate twice that of their white counterparts. Similar figures are found, to lesser extents, in eight other districts. Overall, of the 20 districts for which data are available, in ten of those districts a black student is at least 50% more likely than white students to be placed in special education. In contrast, in Green Bay, La Crosse, Beloit, Janesville, and Menomonee Falls a higher percentage of white students than black students was found in special education.

Some other between-district comparisons also show noteworthy discrepancies. For example, 18.2% of black students in the Milwaukee Public Schools (MPS) are identified as in need of special education, compared to 31.6% of black students in Madison. Therefore, a black child in Madison is 70% more likely than one in Milwaukee to find himself or herself placed in special education. But Madison is not the only such district. Other districts with a much higher percentage of their black students in special education than the Milwaukee Public Schools are Oshkosh (30.5%), Wisconsin Rapids (29.4%), Elmbrook (26%), and Fond du Lac (25.4%).

Between-district comparisons are difficult to make without controlling for certain factors that may vary between districts which may have a legitimate impact on driving differences. In other words, any comparisons of rates between districts must account for differences, including but not limited to: 1) the overall size of the district, 2) the overall number of minorities in the district, 3) the relative wealth of families in the district, 3) the geographical loca-

TABLE 25 ODDS-RATIOS FOR STUDENTS WITHIN ETHNIC MINORITY GROUPS BEING IDENTIFIED AS DISABLED, COMPARED TO WHITE STUDENTS, FOR WISCONSIN'S 25 LARGEST SCHOOL DISTRICTS 2000-01 SCHOOL YEAR

District	Asians	Blacks	Hispanics	Indians
Statewide	**0.55**	**1.35**	**0.87**	**1.33**
United States (1999)*	***0.45***	***1.15***	***0.83***	***1.29***
United States (1997)‡	***0.45***	***1.48***	***0.96***	***1.37***
Milwaukee School District	0.36	1.12	0.80	0.92
Madison Metropolitan School District	0.62	2.10	0.97	1.76
Racine School District	0.66	1.85	0.98	1.49
Green Bay Area School District	0.45	0.99	0.55	1.36
Kenosha School District	0.61	1.71	1.01	1.59
Appleton Area School District	0.69	2.08	0.80	2.06
Waukesha School District	0.70	1.44	1.17	1.48
Eau Claire Area School District	0.54	<0.26	<0.39	<0.39
Oshkosh Area School District	0.65	2.17	<0.18	<0.89
Sheboygan Area School District	0.51	1.52	1.04	1.78
Janesville School District	<0.15	0.87	0.45	<0.81
West Allis School District	0.49	1.31	0.81	0.58
Elmbrook School District	0.73	2.47	1.50	0.00
Wausau School District	0.63	1.52	<0.41	<0.63
La Crosse School District	0.60	0.88	0.58	1.17
Wauwatosa School District	<0.13	0.55	0.55	<1.06
Fond du Lac School District	<0.12	1.55	0.74	<0.98
Stevens Point Area School District	0.70	<0.53	0.65	<0.82
West Bend School District	<1.05	<1.05	1.08	<0.82
Neenah School District	0.35	<0.51	0.45	<0.75
Manitowoc School District	0.52	<0.61	<0.25	0.00
Beloit School District	<0.31	0.94	0.62	<1.10
Wisconsin Rapids School District	0.56	2.07	1.26	1.74
Watertown School District†	0.00	0.00	0.00	0.00
Menomonee Falls School District	<0.32	0.23	<0.36	<1.25

** The source for these national figures is from the NCR Report, Appendix 2-A.*

‡ The source for these national figures is from the Harvard Civil Rights Project report, Table 2.

† The odds ratios for all ethnic groups for the Watertown School District are zero since, according to the DPI, no students of any of these races were in special education in the district at the time of the 2000-01 child count.

***Note**: Those districts with ratios preceded by less-than symbols (<) represent districts in which data of actual known odds ratios are unavailable due to confidentiality concerns. As was done in Table 25, these figures show the maximum odds ratio that would occur if five students within that ethnicity were in special education. If the actual number of students within that ethnicity in special education decreases from five to one, the corresponding ratio will also decrease accordingly.*

tion of the district, and 4) the quality of teachers and instruction in the district. One suggestion for future research would be to perform regression and other analyses looking at the impact of these factors. It should be noted that prior research along these lines has suggested that even when controlling for a student's income level, disproportionate identification rates for minorities persist.

Compelling Issues and the Need for Answers

Why are black students in some of the state's largest districts being disproportionately identified as in need of special education? What effects does this higher incidence of identification have on students within the racial/demographic group, both in terms of their learning possibilities within school and opportunities in life after school? Why does this higher identification percentage not occur in the state's largest district, which is also the state's district with the greatest number and percentage of black students?

These are terribly sensitive questions, ones that this author does not claim to have the competency to answer completely or necessarily accurately. The factors influencing the results in question may include improper bias, underlying social concerns, cost concerns, and other, benign reasons. Nevertheless, the reasons for these variations must be identified and examined if educators in this state wish to ensure they are properly serving all students in the state, regardless of their race.

The factors that may animate these wide disparities are numerous, and a few studies have been able to pinpoint some of the possible causes of these numbers. Some of the disparity between Madison and Milwaukee in their percentages of black students placed in special education may be attributable to the overall percentages of black students in Madison versus Milwaukee. In 2000-01, 60.8% of MPS students were black, while only 18.5% of Madison Metropolitan School District's students were black. Therefore, one may theorize that districts with a higher percentage of black students will tend to identify a smaller percentage of their black students as in need of special education, and may even identify a percentage similar to that of white students. However, this explanation does not completely hold true for the Wisconsin school district with the second highest percentage of black students – Beloit. Twenty-eight percent of Beloit's public school students are black, and while the percentage of blacks identified for special education is high (20%), that percentage is roughly equal to that of white students (21%). In fact, Beloit's odds ratio of blacks over whites identified as disabled is 0.94. Nonetheless, no school district in Wisconsin even approaches the proportion of black students as is found in Milwaukee, and it may be the very size of the black student population that is restricting Milwaukee from placing a higher percentage of black students in special education.[80] The prime question, then, is whether there are black students in Milwaukee who are truly disabled and are not being placed within special education. Or are other districts, such as Madison, placing a greater number of black students in special education than are needed to be educated through such programs?

The NRC report suggests two hypothesis to explain why certain areas, such as different school districts, may vary in the placement of minorities into special education. The first is that some type of systematic bias exists, whereby elements of the identification process in the district simply generate a greater identification of minorities. The second theory is based on achievement differences within districts. It essentially suggests that in districts where there are significantly lower achievement levels in certain ethnic groups, such as blacks, than with their white or Asian peers within the district, then there may be a greater disproportionate enrollment of these lower-achieving blacks or Hispanics in special education.[81] This view makes some intuitive sense, for if districts are tending to put their low-achieving students into special education, and certain ethnic groups more commonly fall into that low-achieving category, the result would follow. Still, as discussed earlier, low-achievement, especially when it is based on within-district comparisons and not due to some objective measure, is not a proper basis for placing students in special education.

Unfortunately, the available data, both nationally and in Wisconsin, do not allow for the testing of either hypothesis.[82] In fact, the NRC expressly states that it is unable to conclude that any type of discrimination in placement exists and, even if it does, it cannot definitively state whether that bias results in the over-identification or under-identification of minorities into special education.

It may also certainly be true that blacks in districts with the highest risk ratios disproportionately come from lower-income families or face certain social factors that are not conducive to preparing them well for schooling and learning. However, these considerations *should not* make students disabled as understood under special education law. In fact, as was discussed above, these factors are expressly not to be considered according to DPI administrative rules established for determining a student's need for special education. Moreover, this course of action, if a true description of what is animating special education evaluation teams, uncomfortably harks back to the disparate edu-

cational treatment of the past. As some commentators have remarked, this disproportionality between students of different races appears to be a return to separate but unequal education.

To help guide the answering of these questions, it would be wise to recognize the reasons why, and underlying process by which, students become identified as in need of special education. As described in great detail in earlier portions of this report, there are generally two primary factors that contribute to whether any student is found in need of special education. First, there are the physical or mental disabilities with which students are afflicted. This factor is, to a large extent, one that is attributable to forces outside control of the student, parents, and schools. Second, the collective calculus of all the human actors involved in the student's life, who decide whether the child is in need of (and whether they will receive) special education, is a consideration. This second factor, in contrast to the first, is terribly discretionary. It involves a public policy choice that comes not from the traditional dictates of the IDEA's command to teach all students regardless of their physical or mental disability. Rather, it is derived from individual district policies and opinions on which students should be placed in special education and why they should be so identified. It may also involve the proclivity of parents for placing their children into special education.

The importance of this preceding understanding will be apparent when answers are sought to explain both 1) the disproportionate rate of identification in some districts in terms of racial minorities, and 2) why this disproportionality does not exist in all districts, even those of similar size and other demographic characteristics. Explanations to both of these compelling questions necessarily must come either from scientific or social explanations that are exogenous to the school setting, or they must come from some matter of school district policy, procedure, or other subjective determination.

Some further questions are also worthy of being asked regarding the phenomena surrounding racial disparities in special education in Wisconsin. For example, it would be helpful to know which disabilities the respective ethnic groups are being identified with and if there is any disagreement across ethnic groups both within districts and across districts. The Harvard study presented figures on this issue based on U.S. Department of Education data from 1997, the most recent year for which data were available at the time of the Harvard study. These numbers, replicated in Table 26, show both the national and Wisconsin breakdown.

TABLE 26 ODDS RATIOS BY ALL DISABILITIES AND SPECIFIC DISABILITY CATEGORIES BY ETHNICITY, 1997

Disability	All Disabilities				Mental Retardation (CD)				Emotional Disturbance				Learning Disabilities			
Ethnicity	I	A	B	H	I	A	B	H	I	A	B	H	I	A	B	H
U.S.*	1.37	0.45	1.48	0.96	1.31	0.54	2.88	0.77	1.24	0.29	1.92	0.74	1.50	0.39	1.32	1.17
WI	*1.65*	*0.78*	*1.81*	0.99	1.44	1.16	*3.16*	1.25	*2.63*	*0.21*	*1.99*	0.75	*1.58*	*0.67*	*1.41*	0.97

Legend: ***I = American Indian A = Asian/Pacific B = Black H = Hispanic***
Source: http://www.law.harvard.edu/civilrights/conferences/SpecEd/parrishtable2.html
** All of the national ratios are statistically significant at the .01 level. The italicized Wisconsin ratios are those which are significant at this level.*

These figures show that, as was seen with comparisons between the NRC and Wisconsin data, for all disabilities, students from most minority ethnic groups in Wisconsin have a higher risk of being identified versus white students than is seen at the national level. Second, we see that the greatest rate of higher identification for blacks occurs, by far, in the area of mental retardation placement, referred to as cognitive disabilities in Wisconsin. This finding is also consistent with the national data. Third, while nationally Asians and Hispanics were less likely than whites to be found mentally retarded, in Wisconsin children in these ethnic groups, along with Indians and blacks, were more likely than white students to be found cognitively disabled. Finally, regarding emotional disturbance rates, black students in Wisconsin are placed at a much higher rate than whites (as is also witnessed at the national level). The most interesting finding is the ratio for Indians in Wisconsin, which shows that students of this ethnicity are more than two-and-a-half times as likely as white students to be found emotionally disabled — a rate much greater than that found for Indian students across the nation as a whole.

Summary

As for further analysis of these data, this author will generally defer to those involved in these districts'special education placement decision-making processes to explain the descriptive statistics, including their cause and inter-

pretation. To be sure, a correct and thorough explanation of these disparities, both within and between districts, will involve a series of analyses of the district-by-district polices and procedures that actually drive these results. Of the theories discussed for why these differences occur, district personnel are in the best position to explain which is most likely at play, or to offer other theories for these results. Nonetheless, whatever the causes, explanations must be forthcoming. The findings presented here suggest that some districts are either over-identifying minority students or that other districts are under-identifying minority students. Given the nature of the special education process, one must be concerned with the possible negative impact this will have on a population of students who commonly face difficult odds of success in their schooling.

POSSIBLE CAUSES OF OVER-IDENTIFICATION

It is an open question as to what are the causes of over-identification. Some observers suggest that in order to justify new special education funding from the state, there is a need for establishing more categories of disabilities and a broader range of criteria for placement in these groups that would be open to adding more children within those categories.

The primary concern is that districts — or the state through its regulations — are placing students into special education who are simply low-achieving, and that this lack of achievement is not due primarily to any true physical or mental disability. While the causes for this low achievement can be numerous — environmental deprivation for children in low-income areas, lack of parental support and early childhood education, classroom effects from students learning around other low-achieving students, and so forth — not all of these causes are derived from innate disabilities of the child. Rather, they are merely factors that may make a child more difficult to teach, which is the job of schools to attempt to overcome for all students.

In its June 2001 *Preliminary Report on Eligibility Criteria*, the DPI outlined what it considers to be some of the possible factors affecting incidence rates and perhaps the variation of these rates across districts. Below is the verbatim listing of these proffered possible factors, followed by commentary over the merit of the explanation and whether the explanation conforms to a proper and traditional understanding of special education law and policy.[83]

- *The state's increase in identification rates could reflect the state's change from having one of the lowest incidence rates nationally to having a relatively average incidence rate.*

The notion here is that Wisconsin was slower than the rest of the country to correctly identify students as with disabilities in need of special education. The recent increase is just the product of this lag effect. [See figure 3, *supra*, for an illustration of this point]. Critics of this trend will assert that the percentage of students in need of special education should not have significantly increased over this time. The actual causes of variation between states may be based on factors that would suggest that fewer or greater numbers of Wisconsin students would be expected to be placed in special education. At a minimum, the percentage of students classified as special education in Wisconsin should not have increased at a rate much faster than the rest of the nation and of most states.

The counterpoints to this concern are manifold. First, one could posit that, in years past, school districts, parents, educators, and others were simply not as well-equipped to accurately identify students with learning disabilities and therefore truly in need of special education. In other words, what has changed is not the percentage of children in need, but rather that those in need are being better identified, which, the argument goes, is beneficial. Second, and related to the first point, Wisconsin is now at the national average in terms of the percentage of its students identified as in need of special education. While being at the average for the sake of being at the average is hardly a compelling reason for the increase, it may reflect that Wisconsin is presently in line with the practice of most national educators.

- *Some members of IEP evaluation teams may recommend special education services to help under-performing or difficult-to-teach students who may not be disabled, because insufficient alternatives exist in the school's regular education program, and because the social stigma that in the past was attached to a special education designation has lessened over time.*

This explanation has two particularly interesting elements. First, the notion that "difficult-to-teach" students need special education contravenes the premise that special education is needed solely for disabled students. Yet it is the second element, building on this first idea, that is really intriguing. The idea that stigmatization has diminished for students in special education is certainly growing. Yet, it is a circular idea: one of the reasons why the stigma has

lessened is because students not very "disabled" are being placed into the program. It appears that these IEP teams would therefore be looking at special education as some form of supplemental aid or special tutoring system for merely low-performing students, a departure indeed from what special education should mean.

- *Substantial numbers of children are likely to be identified as disabled because they have not previously received proper academic support. Such a child often is identified as learning disabled, because the child has not been taught the core skill of reading in an appropriate or effective manner.*

This theory reflects the emergence of a newer and much broader conceptualization of the role of special education. To suggest that students who are merely poorly taught by teachers and/or parents will be deemed learning disabled departs from a proper understanding of special education as a means to assist the learning of children who possess mental and physical disabilities. Although this approach is now being advocated by some,[84] the danger it entails is that it will transform a growing segment of the special education population into remedial education. There are strong policy and educational reasons for keeping these concepts distinct. For that matter, it is also incumbent upon teachers and schools to first attempt to teach well all students in regular education, even if success for some students is more difficult to arrive at than for others.

- *There has been an increase in the severity of disabilities identified in children*.

It is unclear what this factor is suppose to mean in the context of looking at variations in incidence rates. The mere increase in the severity of disabilities may simply mean that children who would have had mild disabilities in the past are having severe ones presently. Or perhaps, this explanation should read as stating that more students have severe disabilities over and above those who have had other, less-severe disabilities.

- *Societal changes, such as increasing numbers of single-parent families and increasing incidences of drug and alcohol abuse among children and parents, place greater stress on children and result in increasing incidence of impairments.*

These environmental factors may be true, but their connection to the need for special education is not axiomatic. It is true that some medical conditions suffered during pregnancy and early childhood are often associated with drug use and environmental factors (e.g., fetal alcohol syndrome). However, as was discussed earlier, some disabilities, such as emotional disabilities, are not supposed to be the result of the social factors that this explanation relies upon. Just as one of the preceding explanations sounded of transforming special education into a partly remedial education program, this explanation seems to broaden special education to include those students in greater need of social services. Disabled students may very well be in greater need of social services, but it does not follow that students in need of social services are also disabled. Plus, it is unclear to which disability "greater stress" is a controlling symptom.

- *The variability in membership, size, and number of IEP teams across the state may be a factor inhibiting consistent interpretation and application of eligibility criteria.*

Here we see a concern that variation in the nature of IEP teams across districts may result in certain districts — perhaps those with more IEPteams or teams with greater experience — having different results upon a referral being made. This explanation makes some sense, but it is unclear which direction this force would pull. One likely correlation would be that districts with too few IEPteams to handle a large amount of referrals may be less able (or willing) to correctly decide a child that is in need will not be placed.

- *School districts'use of emergency licensed staff with limited background, training, and experience in special education, to fill special education teacher vacancies, may contribute to inconsistent application of special education requirements, including eligibility criteria*.

This point reflects a concern that during the referral process, persons unable to correctly assess whether students have a disability, and the precise disability the students has, cause disparities in districts. This is likely a valid explanation, although its implicit premise is that special education professionals are more apt to place students in special education. Yet it does not address whether such placement is properly made, versus whether it is just a phenomenon of educators with a specialty being more inclined to view more students as in need of the specialty they are hired to serve.

- *Insufficient pre-service and in-service preparation and training of general education teachers to prepare them for addressing the diverse learning needs of children, including at-risk students, could also lead to an increase in referrals for special education*.

Here we see a factor that directly relates to whether regular classroom teachers feel that they can adequately teach and assist those students who have even mild disabilities without the placement of those students in formal special education programs. Therefore, it suggests a troubling view that regular teachers who find difficulty in teaching some students because of poor training will place at-risk students into special education. The obvious implied solution is that districts ensure that teachers receive sufficient levels of training.

- *Due to the expanding responsibilities that special education leadership personnel in school districts are requested to take on, they may not always be able to devote sufficient time to ensuring that district staff adhere to federal and state requirements*.

This is a troublesome explanation as it seems to suggest the problem is that districts are not able to spend enough time and resources on proper labeling of students by disabilities. Some Wisconsin education policy experts fear the problem is that too much time and energy is spent by districts trying to correctly label students rather than adequately instructing those students according to whatever condition by which they may be afflicted. As with an earlier explanation, the solution is for more special educators to be on staff.

- *As academic standards for children have been set higher, more pressure has been placed on special education to accommodate the students who have not been able to attain the standards*.

This factor again hinges on a conception that low-performing students, whether or not they possess mental or physical disabilities, are proper subjects of special education programs. The rationale is that as student assessments become more common and valued in measuring the success of schools and students, students who perform low on these assessments are doing so not because of poor teaching, effort on the part of students, or any other disabling factor. Moreover, the placement of low-performing students into special education can help hide any district's overall problems with raising student performance for regular students. Similarly, at least one researcher has warned that while increasing rates of labeling children as disabled has increased funding to schools, it rarely carries with it the expected accountability that student achievement should rise, since these children are dubbed "disabled."[85]

- *Greater awareness of the referral process by parents, general educators, and others is evidenced by the increase in prevalence rates over the years*.

This factor may very well be a significant one in the increasing rates found in the state and in some districts in particular. As was discussed above, the legal and administrative process for placing students in special education accords parents significant degree of rights, over which parents are becoming more aware and most willing to invoke. Furthermore, as special education becomes a more common phenomenon, parents and educators may be more apt to conclude that a special education referral is the best route for handling students who may be having personal problems with performance or social interaction within the classroom. In other words, teachers previously dealt with failing students (yet students who did not manifest disabilities) by informally working to help that student. These teachers may now be more inclined to suggest such children be considered for special education placement.

- *A high percentage rate of initial referrals resulting in identified disability could signal a thorough understanding of the eligibility criteria for special education and that parents, general educators, and others are making appropriate referrals for special education. Conversely, a high percentage rate of initial referrals resulting in identified disability could mean that eligibility criteria are not being applied strictly.*

This is the fundamental explanation or concern. If eligibility criteria are the locus for determining a student's need for special education, then proper understanding of the criteria will determine whether students are properly placed. If the eligibility criteria were plain, this reasoning would be very sound. Yet, "a thorough understanding of the eligibility criteria" assumes that the criteria alone are necessarily immune from subjective determinations. As was expounded upon earlier in this report, many of these criteria are anything but being capable of "strict application." Subjective criteria alone can allow for higher identification rates. This different explanation, completely absent in this list, is at least as plausible and deserves greater attention.

- *Increases in specific areas of disability do not necessarily indicate newly identified students. Students may have been included in other categories previously, that is, students with autism may have been identified as students with emotional disturbances, and students with significant developmental delay may have been identified as speech/language*.

If this occurrence is truly the case, which is certainly plausible, it still fails to explain why the overall number of students identified with disabilities continued to rise. If students labeled with one disability are merely re-categorized to another disability, the between-disability numbers will fluctuate, but the disability total should remain constant.

- *Identification of children with learning disabilities and other health impairment (OHI) has increased over the past decade. Learning disabilities have increased steadily, while OHI rose remarkably in 1996 and has continued an upward climb each year since that time. Additionally, autism and traumatic brain injury became new disability categories in 1992.*

These increases explain the overall increases, but it does little to explain why some districts are "discovering" more learning disabilities, while others may not be. And if the trend is across most districts, the compelling question is why are children suddenly being labeled as learning disabled, when perhaps a mere five or ten years ago they would not have been found as such? The addition of autism and traumatic brain injury as new categories also presents an interesting twist on this issue. Earlier in this report, we saw that autism rates have been increasing at large rates in recent years. Since this disability became separately listed in 1992, these numbers have steadily risen. This phenomenon may reflect a long held belief that when a discrete disability category is established, placement teams will be more apt to find more students with that disability. Even though a student with that particular disability would have been deemed disabled before then (autism used to be included in the learning disability category), more students will be seen to fit within that label.

- *More children are being identified as children with disabilities in need of special education at younger ages, thereby impacting incidence rates in later years. Many of these children typically transition from county birth to three early intervention programs to the public school special education programs at age three and are identified as having a significant developmental delay.*

"Transition" is an interesting choice of words. This concern essentially admits that once a child has been identified as in need of special education at an early age, they will continue to be found in special education for the remainder of their schooling career.

Whichever explanations are correct, it is imperative that these questions be answered, and former-Superintendent Benson's demand for such an inspection will be a well-needed reminder of a continued commitment to addressing these concerns. Many of the DPI's explanations suggest that students are being identified for special education not because a mental or physical disability requires that they receive special aid in the school setting but because they are merely performing poorly, either due to poor instruction, home environment, student effort, or other factors, all of which are not properly understood under the traditional mix of factors that special education is meant to address. Other explanations seem to be thinly veiled demands for more expenditures, whether on special education staff, regular education staff, or the administrative referral process.

Overall, despite the explicit requirements mandated under the law, discretion still remains with parents and members of district evaluation teams to press their own preferences and biases upon the determination. In fact, the built-in mechanisms for ensuring that a proper evaluation is made are geared almost exclusively to protecting against having the child not be identified when he or she truly is in need. Conversely, there are no formal mechanisms to guard against the identification of a student in need when the child truly does not qualify. If a school district, an IEP evaluation team, and a child's parents all agree to place a child in special education, there is little oversight found within the system to ensure that such a child truly is in need of special education, rather than a perhaps slow-learner who can be equally educated through regular schooling and perhaps some additional aid, but without being formally labeled as in need of special education.

WHY THE CONCERN WITH OVER-IDENTIFICATION?

Improper placement of students into special education can have direct, negative effects. Some commentators are correct to point out that increasing eligibility rates for special education is positive if such placement results in increased opportunities to learn and improved access to high-quality curriculum and instruction.[86] Yet, incorrectly or inappropriately identifying students as in need of special education can be problematic when it stigmatizes students, separates them from their peers, results in lower academic expectations, generates undesirable educational outcomes for these students, or any other adverse effects.[87] Beyond the educational effects of over-identification there are also the immense direct costs and lost opportunity costs that accompany placement of students into special education. The imposition of these costs, if erroneously allocated to students not truly in need of formal special education programs and protections, is a fiscal result that Wisconsin and its school districts must avoid.

Administrative Costs

Resources used for labeling and categorizing students in various special education disabilities are excessive and possibly wasteful. These are merely transactional costs, and the questionable science of diagnosis under these criteria raises further doubt as to why such effort is put into this process.

Plus, once a child is placed within special education, an enormous amount of legal requirements affix to that child that would not be necessary for a child who, while low-achieving, can perhaps be aided by effective teaching without the full complement of special education rights and duties. For example, to simply change one class in the high school schedule of a student with disabilities, teachers or school staff can not merely call the parents, such as with a traditional student, but must send a notice of action and convene an IEPteam meeting.[88] Plus the cost of "related services" must be assumed by a district once a child is placed in special education, and occasionally these costs can be very high.[89]

This elaborate due process system that accompanies special education is needed and works well for that population of students for whom the IDEAand similar laws were initially targeted. In other words, it helps ensure access to a reasonable education to those physically and mentally retarded who in the past were bypassed by school districts. However, this system of due process and paperwork was designed to ensure access for a small population of students. It does not have the capacity, nor is it necessary, to apply this cumbersome bureaucracy to these rapidly increasing populations that were never denied basic access to an education. Plus one of the troubles with over-identification of students is that once a student is deemed in need of special education to achieve his free and appropriate public education, that interest becomes a type of vested interest. Once the door is swung open, it takes considerable legal, administrative, and pedagogical effort and cost to exit the student from the program.

Unfortunately, it is difficult to itemize the portion of special education costs that go to satisfying the administrative aspects of special education versus those that directly advance the education of disabled students. Nonetheless, this portion of the cost is commonly recognized as being high, especially relative to non-instructional costs in regular education.

Stigmatism and the Inability of Students to Exit the Program

Perhaps one of the most troubling aspects of special education is the general stigma that goes along with becoming a student in these programs. To be sure, frequent declarations that placement in special education is not a fault of the student's merit but rather derives from factors beyond his control help to mitigate the negativity of that label. Likewise, as educators, parents, and others become more sensitive to the needs of students deemed in need of special education, students who are better served by the benefits of special education may truly graduate to educational and vocational success. Regardless, it is difficult to shed the label. After all, special education programs are modified by the term "special," and it is a label that will be carried by those who pass through the programs for the remainder of their lives. Moreover, the label often fosters acceptance of lower expectations for the students in question, which may not otherwise exist if the students properly remained in regular education.

Yet the negative effect of a student being placed in special education could be significantly limited if a significant portion of students placed in special education were able to "graduate" out of that program and be fully integrated back into the general student population. This desire is especially acute for those students on the fringes of being in need of special education, especially those who are only slightly behaviorally, cognitively, learning, or otherwise disabled. One may even see a badge of accomplishment assigned to such students, for they will be understood as having come from further behind and having worked harder to reach a level of learning realized by students who were not encumbered with learning disabilities.

Unfortunately, students who become categorized into one of the learning disabilities that makes them eligible for special education rarely shed that label through the course of their education. As was seen in Table 6, most districts have fairly high reevaluation rates resulting in continued eligibility. The suggested reasons for this phenomenon are varied. First, many of the students placed within special education likely have a learning disability that is fairly severe and beyond the reproach of existing due to simple lack of effort or behavior on the parts of parents, teachers, and students. This group is of less concern for being over-identified, but it also appears to constitute a shrinking proportion of all "disabled" students.

Second, there is a veritable desire for many parents to have their children classified as in need of special education. In many respects, this desire is rational, for savvy parents recognize that students placed within special education will receive additional assistance and very specialized treatment in that child's education. Therefore, for parents of children who are on the margin in terms of both learning capabilities and learning achievement, it may be sensible to place their children in special education. They seek the programs' concomitant benefits rather than leave the children in regular education where they may languish and never achieve meaningful knowledge and skills.

Third, regular classroom teachers commonly have an incentive to redirect their lower-performing students into a special education program. Doing so helps a teacher spend less time on instructing and supervising just one or two students who garner a disproportionate amount of the teacher's time and energy, so that the teacher can be more effective with the remaining students, who are relatively easier to teach. Moreover, labeling a low-performing student as being with a disability requiring special education may be used to mask poor teaching. If a teacher can argue that a student's poor performance, say on standardized assessments, is not the function of poor teaching or the inability of a teacher to motivate a student to perform well, but rather that the student needs help because of a disability, then perhaps that teacher will immunize him or herself from accountability for that student's failings. While the ability of regular teachers to handoff their low-performing students to special educators is now supposedly being curtailed, at least through the federal IDEAprogram, these concerns remain.

Student Performance and Achievement

One of the many important amendments to the IDEA enacted during 1997 was the requirement that all students with disabilities should participate, to the maximum extent feasible, in state and district-wide student assessments. To realize this goal, the law recognizes that, where necessary, appropriate accommodations should be made for disabled students that would go to the students'functional ability to undertake a test, but which does not go to the substantive content or purpose of the assessment at issue. The law also states that alternative assessments must be provided for those few students who, even with accommodations, would be inappropriately assessed through usual student assessment mechanisms.

Wisconsin's primary student assessment system is the Wisconsin Student Assessment System (WSAS), which is composed of both the Wisconsin Reading and Comprehension Test in the third grade and the Wisconsin Knowledge and Concepts Examinations (WCKE) administered in the fourth, eighth, and tenth grades. All students participate in WKCE testing except those who are formally excluded from WKCE tests or who are excused by their parents. Students who are formally excluded from WKCE tests include "Students with disabilities whose long-term academic achievement goals are different from the general student population due to their disabilities." This group is almost exclusively composed of special education students. The second category of excluded students are those whose first language is not English and who are at early levels of English proficiency. Students who are excluded from WKCE tests are considered to be at the "pre-requisite skills" level of proficiency.

The threshold question is what percentage of special education students are actually tested to measure their performance in the Wisconsin Student Assessment System? In the past, student with disabilities were commonly not tested for achievement within the state's formal assessments systems. For example, as recently as the 1997-1998 school year, among students with disabilities, 46% percent of fourth graders, 31% of eighth graders, and 39% of tenth graders were not even assessed in the reading portion of the WSAS.[90] Ideally, a greater percentage of all special education students should be assessed because such involvement provides a more complete picture of how well all special education students are doing in terms of learning. The evident trend, however, is extremely positive. It shows that since 1997-98 the percentage of students with disabilities in Wisconsin who fail to participate in the various WKCE assessments has greatly declined. During this same time period, the percentages of students without disabilities being tested has remained fairly steady. This increase in students taking the test, however, is easily attributable to Wisconsin merely complying with the new requirements mandated in the IDEAamendments of 1997, which demand the inclusion of all disabled students in statewide assessment systems, to the extent feasible. Nonetheless, educators and policy makers are now provided a better picture of the educational success of students who have been placed in special education for the explicit purpose of receiving the same educational opportunities as all other students.

The next issue to inspect is how well special education students are performing on these assessments. Not surprisingly, given that disabled students are frequently, almost by definition, more difficult to teach, students enrolled

in special education generally perform at lower levels of achievement. The question is, how much below the performance of students without disabilities do students in special education perform?

Figure 4 shows statewide summary statistics of Wisconsin student performance on the 2000-01 Fourth, Eighth, and Tenth Grade Knowledge and Concepts examinations for Reading, Language Arts, Mathematics, Science, and Social Studies. The Figure compares proficiency levels between students with disabilities and students without disabilities. The results reveal that students with disabilities perform at lower levels of performance, with more performing at the minimal and basic performance categories and, conversely, fewer performing in the proficient and advanced categories. These results are consistent with achievement levels in other school years in the recent past. The achievement gap is wide across all the subjects, but particularly strong with respect to lower levels of proficiency in mathematics and higher levels of proficiency in Reading and Social Studies. Individual district results comparing students with disabilities to those without disabilities across all of these measures are available on the DPI website.[91]

Completion

Two other common measures of educational success relate to individual students' likelihoods to successfully complete their formal schooling. Graduation rates and dropout rates provide a significant measure of whether a student has satisfactorily reached even a minimum level of educational performance. Based on the Wisconsin School Performance Report, the Wisconsin statewide graduation rate in 2000-01, for public school students, was 89.95% and the statewide dropout rate was 2.12%. The query to be asked in the context of special education is whether students within special education graduate or drop out at differing rates from students who do not have disabilities.

Statewide for all students (public and private), the graduation rate for students with disabilities was 87.3% in 2000-01, compared to 94.5% for students without disabilities. Given that the population size of these two groups is considerably large, this difference is statistically significant. Conversely, 2.94% of students with disabilities dropped out of school in the 2000-01 school year, while only 2.01% of students without disabilities dropped out. While this difference appears not to be that great, it represents a drop out rate for all grades in only that year. The cumulative effect of these different rates over time is dramatic, as evidenced by the actual difference in graduation rates.

One final note is that not all disabled students leave formal schooling in Wisconsin with a high school diploma, even when they do not drop-out of school. The state allows disabled students who do not satisfy graduations requirements to, alternatively, receive "certificates of attendance." Although only a few of the students with disabilities who "graduate" do so via a certificate versus an actual diploma, this segment should be recognized as questionably included in graduation rates.

Suspension Rates

As discussed earlier in the context of analyzing the emotional disturbance eligibility criteria, students placed in special education are accorded greater protection from disciplinary action than may otherwise be appropriate for a child. Nonetheless, district personnel are still allowed to suspend children with disabilities when the action giving rise to the suspension was not caused by the disability the child possesses. What is amazing is the much higher rate at which students with disabilities are suspended in most districts and across Wisconsin as a whole, as compared to students not in special education.

In 2000-01, the out-of school suspension rate for public school students in the state was 6.52%. Yet, statewide, 12.6% of students with disabilities were suspended at some point during the 2000-01 school year, while only 5.5% of children not labeled as with a disability were given out-of-school suspensions. Looking at individual districts, we see that although 42 districts (not including K-8 or UHS districts) suspended 0% of their children with disabilities, the vast majority of districts had rates for students in special education that were greater, often at least twice as large, than regular students. Table 27 shows those districts with the highest suspension rates of students who are placed in special education. The list includes both large and small districts from across the state.

FIGURE 4 2000-01 KNOWLEDGE AND CONCEPTS EXAMINATIONS
PROFICIENCY SUMMARY BY DISTRICT AND BY SCHOOL

Reading

	Student Group	Total Enrolled	Not Tested on WKCE % of Total	Pre-Requisite % of Total	Minimal Perform. % of Total	Basic % of Total	Proficient % of Total	Advanced % of Total
Grade 4	Students with Disabilities	8903	6	17	19	21	34	4
	Students w/o Disabilities	55200	1	2	3	10	65	19
	Difference		**5.00**	**15.00**	**16.00**	**11.00**	**(31.00)**	**(15.00)**
Grade 8	Students with Disabilities	9119	6	9	41	19	23	2
	Students w/o Disabilities	57794	1	1	8	10	53	27
	Difference		**5.00**	**8.00**	**33.00**	**9.00**	**(30.00)**	**(25.00)**
Grade 10	Students with Disabilities	8196	12	8	27	29	18	5
	Students w/o Disabilities	63638	4	1	4	15	38	37
	Difference		**8.00**	**7.00**	**23.00**	**14.00**	**(20.00)**	**(32.00)**

Language Arts

	Student Group	Total Enrolled	Not Tested on WKCE % of Total	Pre-Requisite % of Total	Minimal Perform. % of Total	Basic % of Total	Proficient % of Total	Advanced % of Total
Grade 4	Students with Disabilities	8903	6	17	17	35	20	5
	Students w/o Disabilities	55200	1	2	3	20	46	29
	Difference		**5.00**	**15.00**	**14.00**	**15.00**	**(26.00)**	**(24.00)**
Grade 8	Students with Disabilities	9119	6	9	32	38	13	2
	Students w/o Disabilities	57794	1	1	5	22	46	25
	Difference		**5.00**	**8.00**	**27.00**	**16.00**	**(33.00)**	**(23.00)**
Grade 10	Students with Disabilities	8196	12	8	39	27	12	2
	Students w/o Disabilities	63638	4	1	8	22	44	20
	Difference		**8.00**	**7.00**	**31.00**	**5.00**	**(32.00)**	**(18.00)**

Mathematics

	Student Group	Total Enrolled	Not Tested on WKCE % of Total	Pre-Requisite % of Total	Minimal Perform. % of Total	Basic % of Total	Proficient % of Total	Advanced % of Total
Grade 4	Students with Disabilities	8903.00	4.00	12.00	14.00	37.00	27.00	6.00
	Students w/o Disabilities	55200.00	0.00	2.00	3.00	24.00	47.00	24.00
	Difference		**4.00**	**10.00**	**11.00**	**13.00**	**(20.00)**	**(18.00)**
Grade 8	Students with Disabilities	9119.00	6.00	8.00	48.00	31.00	6.00	1.00
	Students w/o Disabilities	57794.00	1.00	1.00	12.00	41.00	30.00	15.00
	Difference		**5.00**	**7.00**	**36.00**	**(10.00)**	**(24.00)**	**(14.00)**
Grade 10	Students with Disabilities	8196.00	13.00	7.00	55.00	15.00	8.00	1.00
	Students w/o Disabilities	63638.00	5.00	1.00	20.00	24.00	34.00	17.00
	Difference		**8.00**	**6.00**	**35.00**	**(9.00)**	**(26.00)**	**(16.00)**

Science

	Student Group	Total Enrolled	Not Tested on WKCE % of Total	Pre-Requisite % of Total	Minimal Perform. % of Total	Basic % of Total	Proficient % of Total	Advanced % of Total
Grade 4	Students with Disabilities	8903	3	9	12	27	39	10
	Students w/o Disabilities	55200	0	2	4	18	50	25
	Difference		**3.00**	**7.00**	**8.00**	**9.00**	**(11.00)**	**(15.00)**
Grade 8	Students with Disabilities	9119	5	7	28	34	22	4
	Students w/o Disabilities	57794	1	1	7	23	46	22
	Difference		**4.00**	**6.00**	**21.00**	**11.00**	**(24.00)**	**(18.00)**
Grade 10	Students with Disabilities	8196	13	7	36	26	15	3
	Students w/o Disabilities	63638	5	1	10	24	38	22
	Difference		**8.00**	**6.00**	**26.00**	**2.00**	**(23.00)**	**(19.00)**

Social Studies

	Student Group	Total Enrolled	Not Tested on WKCE % of Total	Pre-Requisite % of Total	Minimal Perform. % of Total	Basic % of Total	Proficient % of Total	Advanced % of Total
Grade 4	Students with Disabilities	8903	3	10	13	22	40	12
	Students w/o Disabilities	55200	0	2	4	12	46	36
	Difference		**3.00**	**8.00**	**9.00**	**10.00**	**(6.00)**	**(24.00)**
Grade 8	Students with Disabilities	9119	6	7	18	26	35	7
	Students w/o Disabilities	57794	1	1	3	9	45	40
	Difference		**5.00**	**6.00**	**15.00**	**17.00**	**(10.00)**	**(33.00)**
Grade 10	Students with Disabilities	8196	13	7	23	24	25	8
	Students w/o Disabilities	63638	5	1	5	11	41	38
	Difference		**8.00**	**6.00**	**18.00**	**13.00**	**(16.00)**	**(30.00)**

TABLE 27 DISTRICTS WITH THE HIGHEST SUSPENSION RATE OF DISABLED STUDENTS, *EXCLUDING ALL UHS AND K-8 DISTRICTS*

District	Suspension Rate: Disabled	Suspension Rate: Non-Disabled
Menominee Indian	38.26	16.51
Wabeno Area	30.95	15.47
Milwaukee	28.03	18.56
Bayfield	27.96	12.19
Ladysmith-Hawkins	27.65	8.41
Kenosha	27.44	10.12
Racine	27.15	12.94
Unity	26.26	7.55
Goodman-Armstrong	25.00	3.38
Siren	22.86	8.88

Post-Graduation Achievements

In September 2001, the DPI released a report titled *Wisconsin Statewide Post High School Outcomes Survey of Individuals with Disabilities*, authored by Wisconsin CESA 11 and the St. Norbert College Survey Center. This report looked to document post-high school outcomes of students with disabilities, in particular their participation in independent living activities, postsecondary education, and employment. The study was based on voluntary survey responses from a self-described representative sample of study participants. One of the major limitations of the study, in terms of measuring the development of past special education students, is that it does not include special education students who did not successfully exit their high school education.

Nonetheless, among the results presented were: 1) while three-fourths of former students still lived with their parents a year after leaving high school, this percentage is lower than that of youth with disabilities seen in national studies, and therefore is closer to the rate of youths in the general population; 2) that 47% of former students were attending or have attended some type of postsecondary education, with this rate again higher than the national figures witnessed for former special education students (27%) and close to the general student population of 68%; and 3) that 80% reported being employed for pay (with 57% reporting earning at least $7.00 per hour), compared to national numbers showing that 55% of youth with disabilities were competitively employed. Given these results, either Wisconsin special education students are doing much better at post-secondary achievements than disabled youths nationally, or this study has some reporting bias in its survey results that have inaccurately inflated these outcomes. Another potential reason for these much better results is that Wisconsin has placed more capable individuals in special education than is the national norm. This explanation takes us back to one of our initial questions.

Finally, the tracking of emotionally disturbed students should be a particular concern with regard to whether they go on to criminal activity and incarceration. It may be helpful for the State of Wisconsin to track figures to see if these students unfortunately find themselves eventually in the criminal justice system, and if the high rates of suspension just discussed, translate into this type of behavior. At this junction we do not know; we only know that a very high proportion of those incarcerated read at about the eighth grade level.

General Concerns with the Impact on Public Schooling

Beyond these performance and cost concerns, there is a more fundamental and overarching worry about the developing special education system. Policy-makers and educators should be concerned about a system of formal schooling that separates students by labels of special education versus traditional or “regular” students. Moreover,

under current state funding mechanisms, many districts must use their general state aid or local funding to help finance their special education programs. This takes away funds from regular instructional activities, and is contributing to a growing animosity among parents, educators and others depending on whether their interests are in special education or regular schooling.

There is also the developing, two-tiered society in schools that breeds concern. If students who are not truly mentally or physically disabled are being placed in special education, one has to wonder what this accomplishes that could not be achieved through regular education. Many students now in special education are the types of students who were in our schools already in 1976 when the IDEA was enacted. They were not being overlooked because of some disability. The implication in the present system is that not labeling any low-achieving student as disabled thereby denies the child a free, appropriate public education. This is in error. Such a view has been used to justify entitlements for some children — increasingly at the expense of other, non-special education students. It shows how a poor assumption for the continuing purpose of special education can negatively affect the long-term survival of public education.

Summary

Educators, parents, students, and policy makers should be concerned with the possible over-identification of students as in need of special education. The data are clear that special education students in Wisconsin are, on average, suspended more often, graduate at a lesser rate, achieve less success as adults, and score lower on statewide academic assessments. Furthermore, students placed within special education are often unlikely to exit special education. To be sure, these correlations are not invariably the fault of the state's special education system, as students properly placed in special education programs are afflicted with disabilities that would tend to lead towards similar results. This qualification is especially keen for academic performance measures. The primary concern is with students truly on the margin, who may otherwise be adequately taught and educated without formal placement in the state's special education system.

In addition, the administrative costs associated with Wisconsin's special education system may be wasteful. Many of these costs are not mandated by federal law and may have little positive effect on the actual learning that students accomplish. Rather, the immense focus on labeling students detracts from a focus on helping all children — with or without disability and whether having a mild or severe disability — learn well and effectively. Finally, policy-makers and educators should be concerned about a system of formal schooling that is prone to the segregation of students by labels of special education versus traditional or "regular" students.

CONCLUSION

Gone are the days when mentally or physically retarded children were largely ignored and shuffled out into separate education programs with little more than the nod of school district officials. A needed attention has been directed to children with disabilities so as to secure them the same opportunity to a free public education as all other children are privileged to receive. Yet in this quest, the net for defining who is disabled has been cast widely, all the while members of Wisconsin's government and schools mend even more rungs to the growing edges of this net. The possibility of incorrect identifications of students by IEP teams and other actors in the special education process is a growing concern in Wisconsin, especially for learning disabilities and emotional disabilities.

The provision of specialized education for disabled students can be an effective education policy to help children otherwise excluded from quality learning opportunities. Yet it can also be a system that is abused so as to include a greater number of students than are necessary into the ranks of children with special needs . This greater rate of incidence, when not properly achieved by the identification of children truly in need of aid, accomplishes one of two results, neither of which is positive. First, it may unnecessarily increase total public outlays for special education. This happens if students who are properly capable of learning under the regular educational system are instead included within special education programs. The moment a child is formally placed in special education, a battery of administrative and legal costs affix to that student which, for better of for worse, are ostensibly meant to ensure this child is educated to an appropriate level. Moreover, the teaching costs for those identified rise dramatically. Second, if the funds allocated to special education are limited, an unwarranted increase special education placements will draw away funds that would otherwise be properly used to aid children truly in need. These special education funds would instead be supporting children suffering from maladies that do not warrant the comprehensive assistance found in special education.

Wisconsin school districts vary widely in their rates at which they refer, place, and reevaluate students as in need of special education. Since the process of referring students to special education is almost entirely localized in the sense that district personnel are permitted by the state wide latitude to identify students, districts that wish to place more students are largely able to do so with impunity. In this context, not due to some true disability, but rather because of the inability of some teachers to teach well, students are falling behind in learning and are therefore suddenly thought to be in need of placement as special education students.

As articulated by the 1999 Legislative Audit Bureau report, local districts often do not receive complete funding from the state or federal government to provide for services related to some special education students. Yet this financial disincentive applies mostly to the high-cost disabled students — those with the most acute mental and physical impairments that require extensive expenses to enable the student to partake in district-administered schooling. These are also precisely the types of students whom special education laws are directly expected to assist. Meanwhile, some students that are classified as disabled, thereby triggering state monetary aid to districts with these students, carry a much lower marginal cost to the district. Therefore, there exists a positive monetary incentive for the district to identify more of these students. The incentive is a by-product of the fact that these students generally do not require extensive additional costs to educate them in schools (as compared to highly disabled students) and that per-pupil aid for such students is significantly higher than if that same student was educated as a regular student.

Over-identification of students has caused and will cause serious problems to public school financing. Students placed in special education require, on average, more than twice as much money per-pupil to educate as regular students. Over-identification leads to one of two results: either 1) special education funds remain at the levels they are currently, and students who are not truly disabled will draw away funds that would otherwise go to help truly disabled students in special education, or 2) the state and local districts will spend even more money on these programs by either raising tax rates or reallocating funds that would otherwise serve regular schooling of students who are not listed as disabled. To avoid these negative results, a funding mechanism for special education must be established to create a disincentive to over-identify students into special education.

A focus away from categorical evaluations based on discrete disability groups would better help schools and students reach their educational needs. The language in Wisconsin's rules that inappropriately allows for the identification into special education of students who are merely low-achieving is either ineffectual or harmful. Wisconsin should take a lead in special education policy and limit the basis on which marginally disabled students are placed in special education. Educators in this state must not turn away from the needs of low-achieving students merely because the task of educating them may be difficult.

Special education is not a monolithic concept that should be discussed under a single, simple term. Its component parts are multiple, and many of them are deserving of their own detailed inspection. This report has only addressed one specific issue of special education in Wisconsin — albeit a very important issue. Many other matters remain that require attention, intelligent discussion, and possible policy reform. These areas include such concerns as the system of special education funding and across-district distribution of funds, the quality of education received by special education students, the effect that increasing spending on special education programs has on regular students, and many more specific matters.

Special education is an important and dynamic element of Wisconsin's elementary and secondary education system, and its prominence seems to be growing — along with its cost. The time has come now to examine special education with a keen eye for possible flaws and needed improvements. This inspection must occur before ill-conceived policies, procedures, and funding mechanisms become so entrenched that the inertia common to public education policies in the state becomes so forceful as to block any effective reforms. One of the best places to start is by an inspection of the criteria and process by which an increasing number of Wisconsin's students are being placed in special education.

APPENDIX A

Agency Name	Percent of students with disabilities
Norris School District	31.53
Menominee Indian School District	30.27
Sharon J11 School District	23.96
New Auburn School District	23.12
Lac du Flambeau #1 School District	21.09
La Farge School District	20.82
South Shore School District	20.73
Wauzeka-Steuben School District	20.16
Benton School District	20.07
Mellen School District	20.00
Elcho School District	19.90
Tigerton School District	19.81
Bowler School District	19.51
Wabeno Area School District	19.44
Northwood School District	19.42
Dodgeland School District	19.36
Lake Holcombe School District	19.34
Adams-Friendship Area School District	19.27
Winter School District	19.27
Twin Lakes #4 School District	19.05
Solon Springs School District	19.00
Butternut School District	18.88
Augusta School District	18.83
Beloit School District	18.67
Weston School District	18.37
Richland School District	18.31
Gillett School District	18.18
Westfield School District	18.13
Deerfield Community School District	18.07
Gilmanton School District	17.97
Argyle School District	17.96
Bayfield School District	17.54
Linn J4 School District	17.53
Monroe School District	17.44
Marshall School District	17.26
Birchwood School District	17.22
Webster School District	17.22
Flambeau School District	17.12
Elkhart Lake-Glenbeulah School District	17.06
Rio Community School District	16.99
Edgerton School District	16.97
Trevor Grade School District	16.94
Osseo-Fairchild School District	16.85
Boulder Junction J1 School District	16.73
Kickapoo Area School District	16.70
Glenwood City School District	16.69
Belleville School District	16.55
Shullsburg School District	16.47
Juda School District	16.42
Oconto Falls School District	16.38
Pecatonica Area School District	16.34
Potosi School District	16.34
Eleva-Strum School District	16.32
Herman #22 School District	16.30
Royall School District	16.28
Lakeland UHS School District	16.26
Johnson Creek School District	16.23
Washington School District	16.13
New Glarus School District	16.05
Stoughton Area School District	16.00
Lancaster Community School District	15.90
Neosho J3 School District	15.86
Riverdale School District	15.86
Lena School District	15.84
Suring School District	15.84
Shell Lake School District	15.83
Omro School District	15.82
Luck School District	15.81
Black River Falls School District	15.78
Clinton Community School District	15.77
Crandon School District	15.73
Boyceville Community School District	15.67
Platteville School District	15.63
Boscobel Area School District	15.61
Black Hawk School District	15.60
Coleman School District	15.58
Barneveld School District	15.53
Linn J6 School District	15.52
Plum City School District	15.46
Spring Valley School District	15.42
Sauk Prairie School District	15.40
McFarland School District	15.38
Oconto School District	15.33
Elk Mound Area School District	15.21
Wisconsin Dells School District	15.18
Dodgeville School District	15.14

Agency Name	Percent of students with disabilities
Clear Lake School District	15.13
Neillsville School District	15.06
Crivitz School District	14.99
Madison Metropolitan School District	14.99
Durand School District	14.95
Owen-Withee School District	14.91
Hustisford School District	14.85
Viroqua Area School District	14.85
Markesan School District	14.84
Parkview School District	14.82
Horicon School District	14.79
River Valley School District	14.78
Silver Lake J1 School District	14.76
Bruce School District	14.72
Algoma School District	14.67
Mercer School District	14.66
Brodhead School District	14.65
Shiocton School District	14.63
Wausaukee School District	14.59
Ashwaubenon School District	14.56
De Forest Area School District	14.48
Beecher-Dunbar-Pembine School District	14.45
Blair-Taylor School District	14.44
Ripon School District	14.38
Tri-County Area School District	14.32
Washington-Caldwell School District	14.29
Southern Door School District	14.24
Waterloo School District	14.23
Green Bay Area School District	14.22
Cornell School District	14.19
Random Lake School District	14.18
Siren School District	14.15
Wisconsin Heights School District	14.14
Big Foot UHS School District	14.12
Cadott Community School District	14.12
Raymond #14 School District	14.10
Clayton School District	14.07
Amery School District	14.06
Mosinee School District	14.06
Unity School District	14.04
Jefferson School District	14.03
Denmark School District	14.01
Spooner School District	13.96
North Fond du Lac School District	13.95
Drummond Area School District	13.92
Turtle Lake School District	13.92

Agency Name	Percent of students with disabilities
Hayward Community School District	13.90
Cumberland School District	13.86
White Lake School District	13.85
Mishicot School District	13.82
Wheatland J1 School District	13.79
Janesville School District	13.78
Cuba City School District	13.76
Berlin Area School District	13.74
Lodi School District	13.72
Palmyra-Eagle Area School District	13.72
Frederic School District	13.71
Rubicon J6 School District	13.70
Prairie Farm School District	13.68
Reedsburg School District	13.65
Saint Croix Central School District	13.64
Montello School District	13.62
Whitehall School District	13.61
Weyerhaeuser Area School District	13.60
Fall Creek School District	13.59
Antigo School District	13.58
Barron Area School District	13.58
Sun Prairie Area School District	13.54
Walworth J1 School District	13.54
Rib Lake School District	13.53
Colfax School District	13.52
Laona School District	13.52
Cudahy School District	13.48
Beloit Turner School District	13.45
Hudson School District	13.45
Gilman School District	13.44
Racine School District	13.44
Almond-Bancroft School District	13.42
Belmont Community School District	13.42
Mauston School District	13.40
Brillion School District	13.36
Ashland School District	13.35
Norwalk-Ontario-Wilton School District	13.34
Erin School District	13.30
Mondovi School District	13.29
New Richmond School District	13.29
Portage Community School District	13.29
Oregon School District	13.24
Pardeeville Area School District	13.24
Waupun School District	13.24
Park Falls School District	13.23
Fall River School District	13.21

Agency Name	Percent of students with disabilities
Granton Area School District	13.18
Loyal School District	13.18
Stanley-Boyd Area School District	13.18
Green Lake School District	13.13
Milwaukee School District	13.11
Rice Lake Area School District	13.11
Ithaca School District	13.10
Pulaski Community School District	13.08
Luxemburg-Casco School District	13.07
Ladysmith-Hawkins School District	13.06
Manawa School District	13.06
Grantsburg School District	13.04
Hurley School District	13.04
Baldwin-Woodville Area School District	13.03
Princeton School District	13.03
Union Grove UHS School District	13.03
Evansville Community School District	13.02
Baraboo School District	12.96
Mayville School District	12.94
Shawano-Gresham School District	12.94
Middleton-Cross Plains School District	12.91
Altoona School District	12.88
North Crawford School District	12.88
Cassville School District	12.85
Hartford J1 School District	12.85
Saint Croix Falls School District	12.84
Galesville-Ettrick-Trempealeau	12.83
Oconomowoc Area School District	12.81
Pepin Area School District	12.80
Sevastopol School District	12.78
Goodman-Armstrong School District	12.77
Bristol #1 School District	12.73
Hillsboro School District	12.73
Marion School District	12.71
Wilmot UHS School District	12.69
Prescott School District	12.61
Cochrane-Fountain City School District	12.59
Monona Grove School District	12.59
Edgar School District	12.58
Tomorrow River School District	12.57
Two Rivers School District	12.57
Sparta Area School District	12.54
Menomonie Area School District	12.52
Rosholt School District	12.52
Holmen School District	12.50
Prairie du Chien Area School District	12.49

Agency Name	Percent of students with disabilities
Seneca School District	12.47
Whitewater School District	12.47
Chilton School District	12.43
Kewaskum School District	12.42
Kaukauna Area School District	12.41
Iowa-Grant School District	12.40
Fond du Lac School District	12.36
Nekoosa School District	12.33
Fort Atkinson School District	12.32
Phelps School District	12.31
Richmond School District	12.29
Gibraltar Area School District	12.27
Peshtigo School District	12.23
Plymouth School District	12.22
Maple School District	12.18
Southwestern Wisconsin School District	12.16
Sheboygan Area School District	12.15
Bonduel School District	12.13
De Soto Area School District	12.13
Elmwood School District	12.11
Stockbridge School District	12.08
Auburndale School District	12.06
Fennimore Community School District	12.06
Kenosha School District	12.06
Necedah Area School District	12.06
Oshkosh Area School District	12.06
Woodruff J1 School District	12.05
Poynette School District	12.03
Pewaukee School District	12.02
Ellsworth Community School District	12.01
Three Lakes School District	11.99
Bangor School District	11.98
Lomira School District	11.97
Menasha School District	11.95
Prentice School District	11.95
Melrose-Mindoro School District	11.93
North Cape School District	11.92
La Crosse School District	11.91
Howard-Suamico School District	11.90
Kiel Area School District	11.85
Cameron School District	11.83
Sturgeon Bay School District	11.82
Greenwood School District	11.81
Seymour Community School District	11.81
Cambridge School District	11.74
Beaver Dam School District	11.73

Agency Name	Percent of students with disabilities
Kewaunee School District	11.70
Pittsville School District	11.70
Wilmot Grade School District	11.68
New Berlin School District	11.67
Glidden School District	11.64
Valders Area School District	11.63
Yorkville J2 School District	11.61
Mineral Point School District	11.60
Chetek School District	11.59
Alma Center School District	11.58
Hartland-Lakeside J3 School District	11.56
West Allis School District	11.52
Darlington Community School District	11.51
Cashton School District	11.50
Stone Bank School District	11.50
Verona Area School District	11.49
Wisconsin Rapids School District	11.49
Niagara School District	11.48
Freedom Area School District	11.47
Genoa City J2 School District	11.47
Winneconne Community School District	11.47
Port Washington-Saukville School District	11.46
Campbellsport School District	11.45
Superior School District	11.44
River Ridge School District	11.42
Neenah School District	11.37
Columbus School District	11.33
Mukwonago School District	11.33
Athens School District	11.31
Wittenberg-Birnamwood School District	11.30
Dover #1 School District	11.24
Eau Claire Area School District	11.21
Northland Pines School District	11.20
Randolph School District	11.18
Merrill Area School District	11.17
Bloomer School District	11.15
Friess Lake School District	11.15
Stevens Point Area School District	11.13
D C Everest Area School District	11.11
Highland School District	11.11
Albany School District	11.09
Osceola School District	11.07
Port Edwards School District	11.07
Union Grove J1 School District	11.05
Randall J1 School District	11.03
Weyauwega-Fremont School District	11.03
Wrightstown Community School District	11.03
Chippewa Falls Area School District	10.97
Somerset School District	10.94
Northern Ozaukee School District	10.93
Florence School District	10.92
Minocqua J1 School District	10.89
Delavan-Darien School District	10.87
Appleton Area School District	10.84
Wautoma Area School District	10.84
Colby School District	10.82
River Falls School District	10.82
Independence School District	10.80
Marinette School District	10.79
Abbotsford School District	10.78
Wonewoc-Union Center School District	10.75
Glendale-River Hills School District	10.74
Waunakee Community School District	10.71
Salem J2 School District	10.70
Waukesha School District	10.69
Marshfield School District	10.68
Slinger School District	10.68
Watertown School District	10.67
Muskego-Norway School District	10.65
Wausau School District	10.62
West De Pere School District	10.62
Waterford Graded J1 School District	10.56
Monticello School District	10.53
Hartford UHS School District	10.52
Hilbert School District	10.52
Clintonville School District	10.51
Mount Horeb Area School District	10.51
Cambria-Friesland School District	10.50
Milton School District	10.43
Sheboygan Falls School District	10.43
Cedar Grove-Belgium Area School District	10.42
Westby Area School District	10.38
New Lisbon School District	10.36
Germantown School District	10.33
Washburn School District	10.33
Waupaca School District	10.32
New Holstein School District	10.25
Spencer School District	10.22
Reedsville School District	10.17
Wild Rose School District	10.17
Brighton #1 School District	10.15
Kimberly Area School District	10.14

Agency Name	Percent of students with disabilities
Elkhorn Area School District	10.03
Alma School District	10.02
Oak Creek-Franklin School District	10.02
Tomah Area School District	9.97
Lake Mills Area School District	9.95
Fontana J8 School District	9.83
Rosendale-Brandon School District	9.82
Nicolet UHS School District	9.76
Tomahawk School District	9.76
Burlington Area School District	9.69
Grafton School District	9.67
Kettle Moraine School District	9.64
South Milwaukee School District	9.64
Medford Area School District	9.62
New London School District	9.59
Hortonville School District	9.43
Rhinelander School District	9.40
Thorp School District	9.39
Howards Grove School District	9.35
Iola-Scandinavia School District	9.33
Franklin Public School District	9.28
Phillips School District	9.27
Stratford School District	9.16
Little Chute Area School District	9.11
West Salem School District	9.10
Oostburg School District	9.08
Menomonee Falls School District	8.87
West Bend School District	8.85
Arcadia School District	8.84
De Pere School District	8.84
Waterford UHS School District	8.78
Marathon City School District	8.77
Greenfield School District	8.75
Oakfield School District	8.70
Kohler School District	8.67
Lake Geneva J1 School District	8.67
Cedarburg School District	8.52
East Troy Community School District	8.32
Hamilton School District	8.28
Brown Deer School District	8.26
Manitowoc School District	8.25
Paris J1 School District	7.88
Onalaska School District	7.84
Saint Francis School District	7.58
North Lake School District	7.57
Elmbrook School District	7.49
Merton Community School District	7.49
Williams Bay School District	7.48
Mequon-Thiensville School District	7.46
Greendale School District	7.38
Norway J7 School District	7.30
Shorewood School District	7.24
Richfield J1 School District	7.14
Central/Westosha UHS School District	6.78
Lake Geneva-Genoa City UHS School District	6.74
Wauwatosa School District	6.67
Whitnall School District	6.67
Arrowhead UHS School District	6.54
Geneva J4 School District	5.38
Swallow School District	5.22
Whitefish Bay School District	4.90
Fox Point J2 School District	4.38
Maple Dale-Indian Hill School District	4.35
Lake Country School District	3.17

APPENDIX B

District Name	Total Students	Total State & District Special Ed. Expenditures (in dollars)	Total Federal flow-through funds	Total Spending (Federal, State, and District)	Students with Disabilities	Total Dollars per Disabled Student	Percent of Students with disability	Percent of Students as CD	Percent of Disabled Students as CD	Percent of Students as ED	Percent of Disabled Students as ED	Percent of Students as LD	Percent of Disabled Students as LD	Percent of Students as Speech and Language Disabled	Percent of Disabled Students as Speech and Language Disabled	Percent of Students as Low Incidence	Percent of Disabled Students as Low Incidence	Total initial referrals	Initial referral rate for total public/ non-public enrollment	Total place-ments	Rate of success-ful referrals	Reeval rate resulting in continued eligibility
Abbotsford	705	358,585	54,769	413,354	76	12,514	10.78	2.13	19.74	1.13	10.53	4.11	38.16	3.26	30.26	0.14	1.32	24	3.40	18	75.00	85.19
Adams-Friendship Area	2055	2,297,881	242,603	2,540,484	396	14,298	19.27	2.48	12.88	4.57	23.74	7.45	38.64	3.02	15.66	1.75	9.09	91	4.43	53	58.24	84.13
Albany	460	478,755	49,119	527,874	51	18,867	11.09	*	N/A	*	N/A	5.00	45.1	3.48	31.37	2.61	23.53	25	5.43	15	60.00	98.33
Algoma	975	1,311,465	85,026	1,396,491	143	17,110	14.67	0.92	6.29	2.67	18.18	6.36	43.36	3.49	23.78	1.23	8.39	33	3.38	25	75.76	91.67
Alma Center	622	589,103	53,562	642,665	72	16,076	11.58	1.61	13.89	*	N/A	4.98	43.06	2.89	25	2.09	18.06	10	1.61	10	100.00	96.88
Alma	409	318,514	31,763	350,277	41	16,794	10.02	*	N/A	*	N/A	5.38	53.66	2.20	21.95	2.44	24.39	16	3.91	9	56.25	66.67
Almond-Bancroft	529	429,485	43,065	472,550	71	13,685	13.42	*	N/A	*	N/A	8.13	60.56	2.27	16.9	3.02	22.54	11	2.08	9	81.82	68.42
Altoona	1560	2,079,476	113,867	2,193,343	201	18,613	12.88	1.35	10.45	1.60	12.44	5.38	41.79	2.88	22.39	1.67	12.94	56	3.59	44	78.57	81.25
Amery	2006	1,971,176	182,946	2,154,122	282	14,529	14.06	1.40	9.93	2.24	15.96	6.48	46.1	1.79	12.77	2.14	15.25	39	1.94	30	76.92	88.75
Antigo	3526	4,039,261	315,003	4,354,264	479	17,579	13.58	0.96	7.1	1.67	12.32	6.72	49.48	2.95	21.71	1.28	9.39	98	2.78	48	48.98	85.05
Appleton Area	18,654	16,751,076	1,286,986	18,038,062	2023	16,202	10.84	0.97	8.94	1.05	9.68	5.14	47.38	2.36	21.74	1.33	12.25	411	2.20	321	78.10	83.28
Arcadia	1109	879,522	75,122	954,644	98	17,783	8.84	0.81	9.18	0.72	8.16	3.70	41.84	2.80	31.63	0.81	9.18	34	3.07	21	61.76	86.96
Argyle	373	375,243	35,555	410,798	67	13,420	17.96	2.14	11.94	*	N/A	10.72	59.7	4.02	22.39	1.07	5.97	9	2.41	7	77.78	73.33
Arrowhead UHS	1943	3,964,238	110,234	4,074,472	127	39,996	6.54	0.87	13.39	0.93	14.17	4.22	64.57	*	N/A	0.51	7.87	10	0.51	10	100.00	73.91
Ashland	2464	2,440,166	207,613	2,647,779	329	16,488	13.35	0.69	5.17	3.53	26.44	4.99	37.39	2.92	21.88	1.22	9.12	95	3.86	63	66.32	92.24
Ashwaubenon	3284	3,671,065	284,890	3,955,955	478	16,225	14.56	1.37	9.41	3.44	23.64	4.99	34.31	2.83	19.46	1.92	13.18	145	4.42	93	64.14	77.98
Athens	734	395,964	59,180	455,144	83	13,515	11.31	*	N/A	0.95	8.43	5.86	51.81	2.86	25.3	1.63	14.46	38	5.18	22	57.89	92.31
Auburndale	1012	1,048,676	87,304	1,135,980	122	16,180	12.06	1.98	16.39	1.38	11.48	5.34	44.26	2.67	22.13	0.69	5.74	18	1.78	8	44.44	92.86
Augusta	717	841,503	81,929	923,432	135	14,922	18.83	1.95	10.37	2.37	12.59	8.37	44.44	4.74	25.19	1.39	7.41	27	3.77	14	51.85	78.95
Baldwin-Woodville Area	1428	1,388,980	114,389	1,503,369	186	15,272	13.03	1.12	8.6	1.82	13.98	5.32	40.86	2.10	16.13	2.66	20.43	43	3.01	30	69.77	82.25
Bangor	768	698,720	54,181	752,901	92	15,097	11.98	1.43	11.96	1.69	14.13	5.99	50	2.34	19.57	0.52	4.35	28	3.65	6	21.43	91.30
Baraboo	3417	3,059,753	273,224	3,332,977	443	14,548	12.96	1.46	11.29	2.58	19.86	6.12	47.18	1.87	14.45	0.94	7.22	91	2.66	44	48.35	77.36
Barneveld	438	550,785	41,650	592,435	68	17,806	15.53	*	N/A	2.97	19.12	9.13	58.82	2.28	14.71	1.14	7.35	15	3.42	11	73.33	88.89
Barron Area	1664	1,619,478	149,584	1,769,062	226	15,463	13.58	2.40	17.7	1.68	12.39	6.49	47.79	1.74	12.83	1.26	9.29	51	3.06	43	84.31	83.56
Bayfield	536	715,155	51,163	766,318	94	18,761	17.54	1.31	7.45	3.92	22.34	5.41	30.85	3.73	21.28	3.17	18.09	18	3.36	14	77.78	70.59
Beaver Dam	4270	4,022,559	317,582	4,340,141	501	16,585	11.73	1.55	13.17	1.71	14.57	5.64	48.1	2.13	18.16	0.70	5.99	69	1.62	67	97.10	93.75
Beecher-Dunbar-Pembine	436	406,822	39,101	445,923	63	17,208	14.45	1.38	9.52	*	N/A	6.65	46.03	2.98	20.63	3.44	23.81	6	1.38	6	100.00	91.30

District Name	Total Students	Total State & District Special Ed. Expenditures (in dollars)	Total Federal flow-through funds	Total Spending (Federal, State, and District)	Students with Disabilities	Total Dollars per Disabled Student	Percent of Students with disability	Percent of Students as CD	Percent of Disabled Students as CD	Percent of Students as ED	Percent of Disabled Students as ED	Percent of Students as LD	Percent of Disabled Students as LD	Percent of Students as Speech and Language Disabled	Percent of Disabled Students as Speech and Language Disabled	Percent of Students as Low Incidence	Percent of Disabled Students as Low Incidence	Total initial referrals	Initial referral rate for total public/ non-public enrollment	Total place-ments	Rate of success-ful referrals	Reeval rate resulting in continued eligibility
Belleville	888	1,395,121	89,396	1,484,517	147	18,263	16.55	0.90	5.44	3.38	20.41	7.43	44.9	3.83	23.13	1.01	6.12	17	1.91	16	94.12	90.32
Belmont Community	395	380,513	39,510	420,023	53	15,762	13.42	1.52	11.32	*	N/A	7.59	56.6	3.04	22.64	1.27	9.43	11	2.78	10	90.91	84.62
Beloit	7406	10,786,431	802,131	11,588,562	1383	16,944	18.67	2.82	15.11	2.42	12.94	8.10	43.38	4.12	22.05	1.22	6.51	345	4.66	227	65.80	77.25
Beloit Turner	1130	1,348,643	100,249	1,448,892	152	17,466	13.45	1.42	10.53	1.59	11.84	5.93	44.08	4.07	30.26	0.44	3.29	41	3.63	25	60.98	88.10
Benton	299	280,157	33,751	313,908	60	13,512	20.07	2.34	11.67	*	N/A	8.70	43.33	7.02	35	2.01	10	10	3.34	3	30.00	86.96
Berlin Area	2023	2,419,746	166,555	2,586,301	278	16,317	13.74	1.43	10.43	1.58	11.51	7.37	53.6	2.37	17.27	0.99	7.19	51	2.52	40	78.43	80.56
Big Foot UHS	524	391,927	32,404	424,331	74	14,679	14.12	*	N/A	3.44	24.32	9.35	66.22	*	N/A	1.34	9.46	2	0.38	2	100.00	96.67
Birchwood	331	446,497	34,746	481,243	57	17,492	17.22	2.72	15.79	*	N/A	8.16	47.37	2.72	15.79	3.63	21.05	14	4.23	10	71.43	75.00
Black Hawk	609	674,615	65,710	740,325	95	16,389	15.60	1.64	10.53	0.99	6.32	6.57	42.11	3.94	25.26	2.46	15.79	16	2.63	10	62.50	65.22
Black River Falls	2003	1,905,209	184,342	2,089,551	316	13,874	15.78	2.85	18.04	2.65	16.77	8.09	51.27	1.45	9.18	0.75	4.75	61	3.05	38	62.30	90.38
Blair-Taylor	734	972,903	73,574	1,046,477	106	17,059	14.44	3.27	22.64	1.09	7.55	5.86	40.57	2.72	18.87	1.50	10.38	16	2.18	10	62.50	90.00
Bloomer	1354	1,580,344	95,092	1,675,436	151	19,213	11.15	0.52	4.64	1.99	17.88	5.54	49.67	1.62	14.57	1.48	13.25	38	2.81	25	65.79	84.48
Bonduel	1121	917,529	81,479	999,008	136	14,738	12.13	0.98	8.09	0.98	8.09	4.46	36.76	3.66	30.15	2.05	16.91	34	3.03	22	64.71	82.69
Boscobel Area	1006	993,284	107,957	1,101,241	157	14,731	15.61	2.29	14.65	2.68	17.20	5.96	38.22	3.48	22.29	1.19	7.64	49	4.87	34	69.39	80.00
Boulder Junction J1	245	260,220	19,878	280,098	41	17,341	16.73	*	N/A	2.45	14.63	7.35	43.9	4.90	29.27	2.04	12.2	9	3.67	4	44.44	28.57
Bowler	574	883,532	65,816	949,348	112	16,589	19.51	1.57	8.04	4.18	21.43	7.49	38.39	4.36	22.32	1.92	9.82	24	4.18	14	58.33	78.95
Boyceville Community	951	957,240	101,026	1,058,266	149	14,983	15.67	2.73	17.45	1.26	8.05	7.26	46.31	2.52	16.11	1.89	12.08	32	3.36	19	59.38	84.21
Brighton #1	197	194,910	14,231	209,141	20	18,440	10.15	*	N/A	*	N/A	4.06	40	3.55	35	2.54	25	6	3.05	3	50.00	75.00
Brillion	1100	521,436	87,392	608,828	147	11,102	13.36	0.91	6.8	0.73	5.44	5.09	38.1	5.36	40.14	1.27	9.52	37	3.36	32	86.49	78.05
Bristol #1	550	516,144	34,228	550,372	70	15,195	12.73	*	N/A	*	N/A	6.55	51.43	3.09	24.29	3.09	24.29	45	8.18	18	40.00	83.33
Brodhead	1256	1,161,893	108,924	1,270,817	184	14,040	14.65	2.23	15.14	1.91	12.97	6.93	47.03	1.43	9.73	2.15	14.59	47	3.74	37	78.72	84.51
Brown Deer	1744	1,871,403	98,690	1,970,093	144	22,978	8.26	1.09	13.19	0.75	9.03	2.58	31.25	2.41	29.17	1.43	17.36	32	1.83	22	68.75	78.00
Bruce	632	1,094,659	65,231	1,159,890	93	20,550	14.72	1.74	11.83	2.22	15.05	6.96	47.31	2.69	18.28	1.11	7.53	23	3.64	17	73.91	95.24
Burlington Area	4686	60,039	291,593	351,632	454	7,084	9.69	0.83	8.59	1.62	16.74	3.97	40.97	2.03	20.93	1.24	12.78	148	3.16	81	54.73	94.34
Butternut	233	309,694	25,379	335,073	44	17,401	18.88	*	N/A	*	N/A	8.58	45.45	7.30	38.64	3.00	15.91	4	1.72	4	100.00	54.55
Cadott Community	1006	1,391,972	91,785	1,483,757	142	17,464	14.12	2.39	16.9	1.59	11.27	4.97	35.21	3.68	26.06	1.49	10.56	31	3.08	18	58.06	81.67
Cambria-Friesland	505	439,154	35,562	474,716	53	16,891	10.50	1.78	16.98	*	N/A	3.56	33.96	3.56	33.96	1.58	15.09	9	1.78	8	88.89	70.59
Cambridge	1090	1,304,844	85,220	1,390,064	128	18,966	11.74	1.19	10.16	2.48	21.09	3.67	31.25	2.75	23.44	1.65	14.06	32	2.94	21	65.63	88.37
Cameron	871	903,404	67,901	971,305	103	16,987	11.83	2.87	24.27	1.03	8.74	4.48	37.86	1.84	15.53	1.61	13.59	47	5.40	32	68.09	87.50
Campbellsport	1878	1,546,924	150,943	1,697,867	215	14,561	11.45	1.54	13.49	0.91	7.91	6.12	53.49	2.13	18.6	0.75	6.51	34	1.81	28	82.35	75.86

District Name	Total Students	Total State & District Special Ed. Expenditures (in dollars)	Total Federal flow-through funds	Total Spending (Federal, State, and District)	Students with Disabilities	Total Dollars per Disabled Student	Percent of Students with disability	Percent of Students as CD	Percent of Disabled Students as CD	Percent of Students as ED	Percent of Disabled Students as ED	Percent of Students as LD	Percent of Disabled Students as LD	Percent of Students as Speech and Language Disabled	Percent of Disabled Students as Speech and Language Disabled	Percent of Students as Low Incidence	Percent of Disabled Students as Low Incidence	Total initial referrals	Initial referral rate for total public/ non-public enrollment	Total place-ments	Rate of success-ful referrals	Reeval rate resulting in continued eligibility
Cashton	678	491,542	49,656	541,198	78	14,536	11.50	2.06	17.95	0.88	7.69	3.69	32.05	3.98	34.62	0.88	7.69	23	3.39	14	60.87	84.38
Cassville	467	273,156	36,428	309,584	60	13,267	12.85	1.28	10	*	N/A	7.07	55	3.00	23.33	1.50	11.67	13	2.78	9	69.23	68.75
Cedar Grove-Belgium Area	1075	1,085,533	76,097	1,161,630	112	17,677	10.42	0.74	7.14	1.67	16.07	5.02	48.21	2.33	22.32	0.65	6.25	46	4.28	30	65.22	77.50
Cedarburg	3895	2,968,448	210,218	3,178,666	332	17,545	8.52	0.56	6.63	1.26	14.76	3.13	36.75	2.05	24.1	1.51	17.77	117	3.00	80	68.38	87.36
Central/Westosha UHS	1135	647,674	53,202	700,876	77	16,896	6.78	0.53	7.79	1.15	16.88	4.32	63.64	*	N/A	0.79	11.69	13	1.15	5	38.46	95.83
Chetek	1087	796,227	68,313	864,540	126	13,822	11.59	1.29	11.11	1.38	11.90	6.81	58.73	0.92	7.94	1.20	10.32	46	4.23	23	50.00	94.29
Chilton	1512	758,830	114,575	873,405	188	11,234	12.43	1.06	8.51	1.52	12.23	5.36	43.09	3.31	26.6	1.19	9.57	48	3.17	30	62.50	56.52
Chippewa Falls Area	5444	4,454,203	361,900	4,816,103	597	15,189	10.97	1.69	15.41	1.30	11.89	3.42	31.16	2.85	25.96	1.71	15.58	158	2.90	92	58.23	82.35
Clayton	398	406,406	32,442	438,848	56	15,903	14.07	*	N/A	*	N/A	6.03	42.86	4.77	33.93	3.27	23.21	19	4.77	16	84.21	86.67
Clear Lake	714	660,369	73,062	733,431	108	14,173	15.13	1.12	7.41	1.68	11.11	5.88	38.89	3.64	24.07	2.80	18.52	17	2.38	12	70.59	80.00
Clinton Community	1167	2,035,992	105,615	2,141,607	184	19,583	15.77	0.86	5.43	1.46	9.24	9.60	60.87	2.49	15.76	1.37	8.7	28	2.40	17	60.71	89.55
Clintonville	1950	1,925,395	146,154	2,071,549	205	17,805	10.51	1.03	9.76	1.08	10.24	4.82	45.85	2.77	26.34	0.82	7.8	42	2.15	21	50.00	85.29
Cochrane-Fountain City	802	629,580	62,587	692,167	101	14,637	12.59	1.12	8.91	2.00	15.84	5.11	40.59	2.49	19.8	1.87	14.85	17	2.12	10	58.82	94.59
Colby	1257	1,270,327	97,638	1,367,965	136	17,748	10.82	2.15	19.85	0.48	4.41	4.06	37.5	3.02	27.94	1.11	10.29	44	3.50	19	43.18	68.33
Coleman	937	786,854	88,118	874,972	146	13,509	15.58	1.17	7.53	0.75	4.79	9.61	61.64	1.92	12.33	2.13	13.7	38	4.06	22	57.89	90.20
Colfax	895	699,482	68,038	767,520	121	12,385	13.52	1.68	12.4	1.45	10.74	6.03	44.63	2.23	16.53	2.12	15.7	44	4.92	31	70.45	100.00
Columbus	1660	1,100,635	115,080	1,215,715	188	14,017	11.33	0.84	7.45	1.33	11.70	5.30	46.81	2.41	21.28	1.45	12.77	50	3.01	20	40.00	70.97
Cornell	578	1,278,643	57,469	1,336,112	82	24,604	14.19	1.21	8.54	3.81	26.83	4.50	31.71	3.11	21.95	1.56	10.98	27	4.67	20	74.07	75.00
Crandon	1087	1,206,396	106,472	1,312,868	171	15,346	15.73	1.20	7.65	2.48	15.88	7.45	47.64	2.48	15.88	2.12	13.53	37	3.40	15	40.54	89.36
Crivitz	887	797,908	92,376	890,284	133	14,431	14.99	1.13	7.52	2.03	13.53	7.67	51.13	3.27	21.8	0.90	6.02	41	4.62	25	60.98	81.33
Cuba City	1083	1,170,897	85,689	1,256,586	149	16,548	13.76	1.29	9.4	*	N/A	6.37	46.31	4.52	32.89	1.57	11.41	38	3.51	22	57.89	85.71
Cudahy	3250	3,799,732	250,880	4,050,612	438	17,933	13.48	0.68	5.02	2.65	19.63	6.18	45.89	1.91	14.16	2.06	15.3	118	3.63	80	67.80	94.67
Cumberland	1284	1,334,604	99,410	1,434,014	178	14,967	13.86	3.19	23.03	1.56	11.24	4.75	34.27	2.41	17.42	1.95	14.04	43	3.35	31	72.09	89.39
D C Everest Area	5725	4,139,511	384,696	4,524,207	636	14,021	11.11	1.15	10.38	1.61	14.47	4.82	43.4	3.21	28.93	0.31	2.83	142	2.48	113	79.58	87.50
Darlington Community	964	953,461	74,081	1,027,542	111	16,437	11.51	1.76	15.32	*	N/A	6.33	54.95	2.59	22.52	0.83	7.21	14	1.45	12	85.71	81.25
De Forest Area	3073	3,596,765	292,165	3,888,930	445	16,955	14.48	1.07	7.42	2.70	18.65	5.11	35.28	4.26	29.44	1.33	9.21	99	3.22	47	47.47	80.95
De Pere	3381	1,597,634	180,645	1,778,279	299	12,449	8.84	1.39	15.72	1.63	18.39	2.63	29.77	2.43	27.42	0.77	8.7	106	3.14	93	87.74	73.33
De Soto Area	717	685,250	49,907	735,157	87	16,669	12.13	1.12	9.2	0.98	8.05	6.14	50.57	2.93	24.14	0.98	8.05	17	2.37	7	41.18	96.77
Deerfield Community	747	1,011,924	77,111	1,089,035	135	16,922	18.07	*	N/A	1.74	9.63	11.11	61.48	3.08	17.04	2.14	11.85	35	4.69	21	60.00	81.82

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Delavan-Darien	3210	567,613	207,016	774,629	349	8,809	10.87	1.74	16.05	0.93	8.60	5.02	46.13	1.96	18.05	1.21	11.17	94	2.93	71	75.33	76.47
Denmark	1856	1,425,875	152,321	1,578,196	260	12,990	14.01	1.29	9.23	1.51	10.77	6.95	49.62	2.86	20.38	1.40	10	59	3.18	36	61.02	81.19
Dodgeland	935	1,340,520	105,165	1,445,685	181	16,855	19.36	1.60	8.29	3.21	16.57	8.45	43.65	2.99	15.47	3.10	16.02	32	3.42	24	75.00	85.48
Dodgeville	1499	1,588,753	144,124	1,732,877	227	15,767	15.14	1.67	11.01	3.07	20.26	6.67	44.05	2.33	15.42	1.40	9.25	66	4.40	45	68.18	82.54
Dover #1	89	225	5,493	5,718	10	8,495	11.24	*	N/A	*	N/A	*	N/A	*	N/A	11.24	100	5	5.62	5	100.00	0.00
Drummond Area	582	737,531	48,744	786,275	81	17,566	13.92	1.37	9.88	2.41	17.28	4.30	30.86	3.95	28.4	1.89	13.58	19	3.26	9	47.37	80.00
Durand	1398	1,972,786	131,875	2,104,661	209	17,973	14.95	1.65	11	1.65	11.00	6.37	42.58	2.50	16.75	2.79	18.66	44	3.15	29	65.91	73.13
East Troy Community	1994	409,145	100,874	510,019	166	10,061	8.32	0.75	9.04	0.85	10.24	2.86	34.34	2.96	35.54	0.90	10.84	46	2.31	32	69.57	72.92
Eau Claire Area	12,931	13,321,959	956,195	14,278,154	1449	18,038	11.21	1.26	11.25	1.57	14.01	4.96	44.24	2.10	18.7	1.31	11.66	337	2.61	232	68.84	80.69
Edgar	779	542,646	59,779	602,425	98	13,268	12.58	*	N/A	1.93	15.31	8.22	65.31	1.67	13.27	0.77	6.12	26	3.34	15	57.69	100.00
Edgerton	2068	3,124,897	205,874	3,330,771	351	17,509	16.97	1.84	10.83	2.03	11.97	8.22	48.43	2.66	15.67	2.22	13.11	79	3.82	54	68.35	83.87
Elcho	417	554,412	41,116	595,528	83	15,286	19.90	1.44	7.23	5.04	25.30	7.91	39.76	3.60	18.07	1.92	9.64	12	2.88	10	83.33	70.59
Eleva-Strum	680	575,040	76,317	651,357	111	13,539	16.32	1.76	10.81	*	N/A	11.18	68.47	2.50	15.32	0.88	5.41	30	4.41	8	26.67	66.67
Elk Mound Area	868	901,580	67,832	969,412	132	14,727	15.21	1.04	6.82	1.38	9.09	4.72	31.06	5.76	37.88	2.30	15.15	29	3.34	25	86.21	92.11
Elkhart Lake-Glenbeulah	592	769,768	64,127	833,895	101	16,892	17.06	1.18	6.93	1.01	5.94	8.95	52.48	5.57	32.67	0.34	1.98	20	3.38	19	95.00	67.50
Elkhorn Area	2723	425,296	158,971	584,267	273	8,617	10.03	1.29	12.82	1.36	13.55	4.59	45.79	1.84	18.32	0.95	9.52	113	4.15	66	58.41	82.14
Ellsworth Community	1981	2,096,159	148,349	2,244,508	238	16,674	12.01	1.06	8.82	1.87	15.55	4.54	37.82	2.37	19.75	2.17	18.07	48	2.42	40	83.33	85.92
Elmbrook	10,991	13,298,086	565,897	13,863,983	823	26,009	7.49	0.35	4.62	0.69	9.23	2.80	37.42	1.48	19.81	2.16	28.8	204	1.86	153	75.00	75.09
Elmwood	413	370,603	29,638	400,241	50	16,013	12.11	*	N/A	2.18	18.00	4.12	34	2.66	22	3.15	26	7	1.69	6	85.71	87.50
Erin #2	376	316,103	32,700	348,803	50	14,578	13.30	*	N/A	*	N/A	5.85	44	4.79	36	2.66	20	15	3.99	9	60.00	88.89
Evansville Community	1529	1,579,792	126,826	1,706,618	199	15,855	13.02	0.92	7.04	2.22	17.09	5.17	39.7	2.29	17.59	2.42	18.59	47	3.07	30	63.83	75.76
Fall Creek	861	1,354,565	65,588	1,420,153	117	19,904	13.59	*	N/A	*	N/A	7.20	52.99	3.48	25.64	2.90	21.37	25	2.90	19	76.00	54.29
Fall River	439	369,357	31,662	401,019	58	14,870	13.21	1.59	12.07	*	N/A	5.69	43.1	3.64	27.59	2.28	17.24	18	4.10	10	55.56	92.31
Fennimore Community	879	691,421	61,911	753,332	106	14,127	12.06	*	N/A	1.14	9.43	4.44	36.79	2.73	22.64	3.75	31.13	15	1.71	11	73.33	65.00
Flambeau	736	1,423,490	76,681	1,500,171	126	20,479	17.12	2.04	11.9	0.82	4.76	9.92	57.94	3.94	23.02	0.41	2.38	58	7.88	42	72.41	80.56
Florence	870	850,589	60,371	910,960	95	17,795	10.92	1.49	13.68	0.92	8.42	5.98	54.74	1.84	16.84	0.69	6.32	25	2.87	13	52.00	86.67
Fond du Lac	9386	8,470,061	699,344	9,169,405	1160	15,166	12.36	1.26	10.17	1.29	10.43	6.34	51.29	2.80	22.67	0.67	5.43	225	2.40	200	88.89	92.86
Fontana J8	295	68,563	25,670	94,233	29	12,161	9.83	*	N/A	*	N/A	4.07	41.38	3.05	31.03	2.71	27.59	16	5.42	8	50.00	85.71
Fort Atkinson	3068	2,710,204	225,168	2,935,372	378	15,565	12.32	1.27	10.32	2.25	18.25	4.47	36.24	3.26	26.46	1.08	8.73	130	4.24	70	53.85	63.06
Fox Point J2	1758	1,401,088	66,730	1,467,818	77	29,096	4.38	*	N/A	*	N/A	1.31	29.87	2.05	46.75	1.02	23.38	51	2.90	35	68.63	81.82

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Franklin Public	4276	5,111,204	253,752	5,364,956	397	22,037	9.28	0.44	4.79	0.96	10.33	4.12	44.33	2.74	29.47	1.03	11.08	109	2.55	71	65.14	83.77
Frederic	620	541,968	56,302	598,270	85	15,016	13.71	1.29	9.41	0.97	7.06	7.74	56.47	3.06	22.35	0.65	4.71	24	3.87	9	37.50	79.17
Freedom Area	1787	1,536,251	118,950	1,655,201	205	15,270	11.47	1.29	11.22	2.13	18.54	4.81	41.95	2.35	20.49	0.90	7.8	84	4.70	44	52.38	97.73
Friess Lake	314	189,322	17,198	206,520	35	14,236	11.15	*	N/A	*	N/A	3.50	31.43	4.78	42.86	2.87	25.71	16	5.10	10	62.50	100.00
Galesville-Ettrick-Trempealeau	1450	1,221,804	106,654	1,328,458	186	13,901	12.83	1.59	12.37	1.59	12.37	6.97	54.3	1.66	12.9	1.03	8.06	62	4.28	43	69.35	77.55
Geneva J4	130	17,433	7,177	24,610	7	12,861	5.38	*	N/A	*	N/A	*	N/A	4.62	85.71	0.77	14.29	4	3.08	3	75.00	100.00
Genoa City J2	584	92,386	29,260	121,646	67	7,753	11.47	1.37	11.94	*	N/A	3.94	34.33	4.28	37.31	1.88	16.42	31	5.31	19	61.29	76.00
Germantown	4106	4,581,094	290,526	4,871,620	424	19,582	10.33	0.68	6.6	1.53	14.86	4.12	39.86	3.09	29.95	0.90	8.73	101	2.46	63	62.38	64.15
Gibraltar Area	693	995,547	56,116	1,051,663	85	22,927	12.27	*	N/A	1.44	11.76	5.92	48.24	3.61	29.41	1.30	10.59	12	1.73	10	83.33	60.00
Gillett	858	924,189	89,615	1,013,804	156	13,451	18.18	1.86	10.26	2.91	16.03	5.48	30.13	6.29	34.62	1.63	8.97	32	3.73	22	68.75	84.44
Gilman	558	661,720	52,190	713,910	75	17,304	13.44	*	N/A	1.43	10.67	6.45	48	3.76	28	1.79	13.33	16	2.87	8	50.00	87.50
Gilmanton	256	322,575	27,792	350,367	46	15,523	17.97	*	N/A	*	N/A	10.16	56.52	2.73	15.22	5.08	28.26	2	0.78	1	50.00	100.00
Glendale-River Hills	1127	1,770,498	78,787	1,849,285	121	25,496	10.74	0.89	8.26	1.06	9.92	3.46	32.23	3.19	29.75	2.13	19.83	58	5.15	38	65.52	80.00
Glenwood City	857	1,247,533	89,852	1,337,385	143	17,062	16.69	2.10	12.59	1.87	11.19	6.88	41.26	4.32	25.87	1.52	9.09	40	4.67	27	67.50	71.43
Glidden	275	330,374	25,955	356,329	32	19,940	11.64	*	N/A	*	N/A	3.64	31.25	4.00	34.38	4.00	34.38	11	4.00	8	72.73	90.00
Goodman-Armstrong	235	316,750	17,264	334,014	30	21,730	12.77	2.98	23.33	*	N/A	5.96	46.67	*	N/A	3.83	30	5	2.13	5	100.00	100.00
Grafton	2751	2,712,783	179,722	2,892,505	266	19,298	9.67	0.87	9.02	1.16	12.03	3.60	37.22	3.34	34.59	0.69	7.14	56	2.04	44	78.57	89.53
Granton Area	478	428,230	35,680	463,910	63	15,614	13.18	*	N/A	1.67	12.70	5.86	44.44	3.56	26.98	2.09	15.87	18	3.77	10	55.56	75.00
Grantsburg	966	1,005,283	93,425	1,098,708	126	15,909	13.04	2.69	20.63	*	N/A	4.87	37.3	4.04	30.95	1.45	11.11	25	2.59	23	92.00	80.00
Green Bay Area	25,131	34,639,759	2,102,139	36,741,898	3573	18,256	14.22	1.39	9.76	2.90	20.39	5.02	35.27	2.36	16.59	2.55	17.93	771	3.07	676	87.68	89.48
Green Lake	434	512,136	36,847	548,983	57	19,357	13.13	*	N/A	1.84	14.04	6.68	50.88	2.76	21.05	1.84	14.04	6	1.38	5	83.33	78.57
Greendale	3118	2,288,939	166,059	2,454,998	230	20,051	7.38	0.42	5.65	1.48	20.00	3.30	44.78	1.67	22.61	0.51	6.96	71	2.28	60	84.51	90.70
Greenfield	3611	4,206,431	210,684	4,417,115	316	21,902	8.75	0.80	9.18	1.30	14.87	2.88	32.91	2.46	28.16	1.30	14.87	91	2.52	63	69.23	90.11
Greenwood	601	1,036,079	48,180	1,084,259	71	22,967	11.81	1.50	12.68	2.66	22.54	5.16	43.66	1.16	9.86	1.33	11.27	16	2.66	8	50.00	85.71
Hamilton	4542	3,732,787	255,132	3,987,919	376	18,195	8.28	0.40	4.79	0.73	8.78	3.59	43.35	2.58	31.12	0.99	11.97	109	2.40	66	60.55	76.58
Hartford J1	2047	2,352,413	168,496	2,520,909	263	17,457	12.85	1.07	8.37	1.12	8.75	5.72	44.49	4.25	33.08	0.68	5.32	97	4.74	63	64.95	67.44
Hartford UHS	1702	1,248,434	97,866	1,346,300	179	16,199	10.52	1.06	10.06	1.88	17.88	7.11	67.6	*	N/A	0.47	4.47	9	0.53	4	44.44	100.00
Hartland-Lakeside J3	1575	1,872,803	117,877	1,990,680	182	19,109	11.56	1.08	9.34	1.78	15.38	4.83	41.76	2.86	24.73	1.02	8.79	98	6.22	59	60.20	88.06
Hayward Community	2100	2,306,938	180,618	2,487,556	292	16,146	13.90	1.71	12.33	1.67	11.99	6.10	43.84	2.86	20.55	1.57	11.3	62	2.95	45	72.58	88.76

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Herman #22	135	133,371	12,762	146,133	22	17,473	16.30	*	N/A	*	N/A	8.89	54.55	5.93	36.36	1.48	9.09	4	2.96	3	75.00	66.67
Highland	378	337,779	23,202	360,981	42	16,381	11.11	*	N/A	1.85	16.67	3.97	35.71	2.12	19.05	3.17	28.57	9	2.38	8	88.89	77.78
Hilbert	751	246,896	56,454	303,350	79	10,954	10.52	*	N/A	*	N/A	6.52	62.03	3.20	30.38	0.80	7.59	9	1.20	7	77.78	95.65
Hillsboro	660	505,918	48,653	554,571	84	13,180	12.73	2.12	16.67	*	N/A	6.21	48.81	3.48	27.38	0.91	7.14	41	6.21	21	51.22	86.36
Holmen	2976	3,686,673	222,643	3,909,316	372	17,694	12.50	1.58	12.63	1.55	12.37	4.81	38.44	2.69	21.51	1.88	15.05	93	3.13	56	60.22	80.58
Horicon	1298	1,766,626	129,258	1,895,884	192	17,626	14.79	0.69	4.69	2.31	15.63	6.78	45.83	3.93	26.56	1.08	7.29	44	3.39	29	65.91	82.72
Hortonville	3374	1,994,487	190,618	2,185,105	318	13,368	9.43	0.92	9.75	1.01	10.69	4.98	52.83	1.72	18.24	0.80	8.49	72	2.13	55	76.39	84.91
Howard-Suamico	4647	3,840,465	319,418	4,159,883	553	17,621	11.90	1.14	9.58	1.66	13.92	5.14	43.22	2.56	21.52	1.40	11.75	149	3.20	92	61.74	88.35
Howards Grove	1091	936,387	68,982	1,005,369	102	14,311	9.35	0.55	5.88	*	N/A	5.68	60.78	2.02	21.57	1.10	11.76	31	2.84	24	77.42	82.05
Hudson	4654	4,854,309	359,089	5,213,398	626	15,160	13.45	0.95	7.03	2.62	19.49	5.26	39.14	3.14	23.32	1.48	11.02	184	3.95	166	90.22	93.57
Hurley	805	1,135,733	65,602	1,201,335	105	19,441	13.04	2.61	20	2.11	16.19	4.60	35.24	2.73	20.95	0.99	7.62	22	2.73	17	77.27	95.83
Hustisford	532	601,915	54,417	656,332	79	16,647	14.85	*	N/A	*	N/A	7.33	49.37	5.08	34.18	2.44	16.46	20	3.76	16	80.00	71.43
Independence	463	573,979	38,600	612,579	50	20,996	10.80	*	N/A	*	N/A	5.18	48	2.81	26	2.81	26	16	3.46	14	87.50	68.42
Iola-Scandinavia	825	440,239	57,362	497,601	77	12,723	9.33	*	N/A	*	N/A	4.73	50.65	3.52	37.66	1.09	11.69	21	2.55	13	61.90	68.75
Iowa-Grant	1016	848,943	75,835	924,778	126	15,447	12.40	2.07	16.67	1.28	10.32	6.10	49.21	1.87	15.08	1.08	8.73	26	2.56	11	42.31	76.09
Ithaca	374	350,000	33,510	383,510	49	15,207	13.10	*	N/A	1.60	12.24	7.49	57.14	2.41	18.37	1.60	12.24	10	2.67	9	90.00	86.96
Janesville	12,247	14,569,274	1,019,344	15,588,618	1688	16,853	13.78	1.29	9.36	1.71	12.38	6.39	46.39	3.08	22.33	1.32	9.6	237	1.94	141	59.49	77.80
Jefferson	2103	2,364,019	184,472	2,548,491	295	16,610	14.03	1.71	12.2	2.00	14.24	4.90	34.92	4.04	28.81	1.38	9.83	91	4.33	58	63.74	68.12
Johnson Creek	610	781,143	57,870	839,013	99	17,088	16.23	2.13	13.13	2.46	15.15	5.08	31.31	4.92	30.3	1.64	10.1	27	4.43	19	70.37	87.10
Juda	335	239,465	34,658	274,123	55	12,651	16.42	*	N/A	*	N/A	5.67	34.55	7.76	47.27	2.99	18.18	12	3.58	8	66.67	76.92
Kaukauna Area	4345	4,174,098	327,687	4,501,785	539	16,469	12.41	1.57	12.59	2.21	17.78	5.34	42.96	2.16	17.41	1.13	9.09	104	2.39	64	61.54	79.12
Kenosha	23,440	24,177,073	1,757,553	25,934,626	2827	17,293	12.06	1.21	10.05	1.57	13.02	4.67	38.73	3.17	26.28	1.43	11.85	666	2.84	435	65.32	75.63
Kettle Moraine	5385	4,561,276	341,638	4,902,914	519	17,107	9.64	0.58	5.97	1.06	10.98	4.62	47.98	2.51	26.01	0.87	9.06	123	2.28	111	90.24	71.51
Kewaskum	2198	2,099,790	173,927	2,273,717	273	15,495	12.42	1.64	13.19	0.77	6.23	5.78	46.52	3.37	27.11	0.86	6.96	44	2.00	24	54.55	69.91
Kewaunee	1351	1,393,472	99,779	1,493,251	158	16,826	11.70	1.26	10.76	0.81	6.96	5.92	50.63	1.18	10.13	2.52	21.52	37	2.74	26	70.27	100.00
Kickapoo Area	437	578,054	54,364	632,418	73	17,446	16.70	3.43	20.55	*	N/A	9.38	56.16	2.52	15.07	1.37	8.22	8	1.83	5	62.50	92.00
Kiel Area	1730	1,221,303	128,382	1,349,685	205	13,701	11.85	0.52	4.39	0.98	8.29	5.20	43.9	3.99	33.66	1.16	9.76	48	2.77	29	60.42	81.16
Kimberly Area	3737	3,006,879	234,012	3,240,891	379	15,665	10.14	0.72	7.12	0.94	9.23	4.79	47.23	2.11	20.84	1.58	15.57	55	1.47	41	74.55	86.96
Kohler	519	447,959	28,302	476,261	45	19,638	8.67	*	N/A	1.16	13.33	1.54	17.78	4.82	55.56	1.16	13.33	12	2.31	8	66.67	75.00
La Crosse	9980	10,630,679	757,422	11,388,101	1189	18,287	11.91	1.38	11.58	1.52	12.75	5.01	41.96	2.78	23.28	1.22	10.23	172	1.72	158	91.86	95.44

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La Farge	317	552,529	35,153	587,682	66	17,721	20.82	5.99	28.79	3.47	16.67	5.36	25.76	4.10	19.7	1.89	9.09	9	2.84	7	77.78	83.87
Lac du Flambeau #1	512	1,159,095	44,160	1,203,255	108	27,673	21.09	3.52	16.67	4.88	23.15	7.23	34.26	3.52	16.67	1.95	9.26	42	8.20	28	66.67	69.57
Ladysmith-Hawkins	1286	2,486,360	107,655	2,594,015	168	24,245	13.06	2.26	17.26	1.63	12.50	4.98	38.1	2.18	16.67	2.02	15.48	41	3.19	27	65.85	81.82
Lake Country	1451	326,995	37,726	364,721	46	17,352	3.17	*	N/A	*	N/A	11.65	367.39	0.83	26.09	0.69	21.74	28	1.93	16	57.14	89.47
Lake Geneva J1	2007	826,292	118,618	944,910	174	11,965	8.67	0.80	9.2	0.75	8.62	2.89	33.33	3.59	41.38	0.65	7.47	61	3.04	42	68.85	55.47
Lake Geneva-Genoa City UHS	1113	279,756	52,757	332,513	75	13,620	6.74	0.90	13.33	0.63	9.33	4.13	61.33	*	N/A	1.08	16	10	0.90	4	40.00	73.91
Lake Holcombe	517	1,151,048	64,252	1,215,300	100	20,288	19.34	1.74	9	2.71	14.00	7.74	40	5.42	28	1.74	9	28	5.42	22	78.57	82.93
Lake Mills Area	1939	1,733,812	136,948	1,870,760	193	17,814	9.95	0.46	4.64	1.03	10.31	5.67	56.7	1.60	15.98	1.19	11.89	26	1.34	14	53.85	77.19
Lakeland UHS	972	1,304,592	76,401	1,380,993	158	18,668	16.26	1.44	8.86	4.94	30.38	9.16	56.33	*	N/A	0.72	4.43	20	2.06	11	55.00	93.94
Lancaster Community	1258	1,548,495	130,050	1,678,545	200	16,515	15.90	1.91	12	1.51	9.50	7.87	49.5	3.58	22.5	1.03	6.5	49	3.90	36	73.47	85.92
Laona	318	239,902	27,099	267,001	43	15,397	13.52	*	N/A	*	N/A	5.66	41.86	3.77	27.91	4.09	30.23	9	2.83	5	55.56	77.78
Lena	524	739,942	52,699	792,641	83	17,125	15.84	2.67	16.87	3.05	19.28	6.68	42.17	2.86	18.07	0.57	3.61	30	5.73	10	33.33	88.46
Linn J4	97	12,972	7,602	20,574	17	12,987	17.53	*	N/A	*	N/A	*	N/A	11.34	64.71	6.19	35.29	6	6.19	5	83.33	100.00
Linn J6	116	62,206	7,877	70,083	18	14,441	15.52	*	N/A	*	N/A	*	N/A	6.03	38.89	9.48	61.11	7	6.03	5	71.43	78.57
Little Chute Area	1953	1,525,610	120,215	1,645,825	178	16,452	9.11	0.56	6.18	1.69	18.54	4.20	46.07	2.15	23.6	0.51	5.62	34	1.74	21	61.76	90.91
Lodi	1618	1,480,256	137,266	1,617,522	222	14,844	13.72	0.62	4.5	2.16	15.77	5.01	36.49	3.58	26.13	2.35	17.12	57	3.52	31	54.39	72.00
Lomira	1337	1,364,820	92,895	1,457,715	160	16,527	11.97	1.12	9.38	1.20	10.00	5.46	45.63	3.44	28.75	0.75	6.25	32	2.39	25	78.13	84.78
Loyal	721	870,820	55,133	925,953	95	17,350	13.18	2.22	16.84	0.97	7.37	5.96	45.26	2.91	22.11	1.11	8.42	20	2.77	14	70.00	81.25
Luck	645	651,166	64,569	715,735	102	14,155	15.81	0.93	5.88	2.33	14.71	7.91	50	3.57	22.55	1.09	6.86	25	3.88	22	88.00	88.64
Luxemburg-Casco	2150	1,723,684	159,472	1,883,156	281	13,541	13.07	0.65	4.98	1.58	12.10	5.40	41.28	3.67	28.11	1.77	13.52	69	3.21	55	79.71	87.88
Madison Metropolitan	29,374	55,232,970	2,408,315	57,641,285	4402	22,679	14.99	1.21	8.06	2.09	13.95	6.50	43.37	2.41	16.08	2.78	18.54	1054	3.59	641	60.82	84.62
Manawa School District	1072	784,949	86,859	871,808	140	13,285	13.06	0.93	7.14	1.12	8.57	6.72	51.43	3.08	23.57	1.21	9.29	31	2.89	13	41.94	75.00
Manitowoc	7720	5,308,792	453,856	5,762,648	637	16,217	8.25	1.52	18.37	0.96	11.62	2.45	29.67	2.22	26.84	1.11	13.5	141	1.83	95	67.38	70.29
Maple Dale-Indian Hill	1907	1,277,112	55,666	1,332,778	83	22,666	4.35	0.42	9.64	*	N/A	1.78	40.96	1.57	36.14	0.58	13.25	33	1.73	20	60.61	70.97
Maple	1388	1,141,110	95,763	1,236,873	169	18,929	12.18	1.01	8.28	1.44	11.83	6.92	56.8	1.30	10.65	1.51	12.43	42	3.03	18	42.86	32.43
Marathon City	958	432,664	72,476	505,140	84	12,543	8.77	0.73	8.33	1.15	13.10	4.28	48.81	2.09	23.81	0.52	5.95	25	2.61	16	64.00	76.92
Marinette	2939	2,728,715	226,680	2,955,395	317	17,203	10.79	1.40	12.93	1.67	15.46	4.46	41.32	1.87	17.35	1.40	12.93	117	3.98	86	73.50	80.53
Marion	669	453,222	49,254	502,476	85	12,856	12.71	1.64	12.94	1.64	12.94	5.98	47.06	1.79	14.12	1.64	12.94	17	2.54	11	64.71	90.48
Markesan	1031	1,178,381	101,170	1,279,551	153	16,094	14.84	1.36	9.15	2.13	14.38	6.11	41.18	3.98	26.8	1.26	8.5	18	1.75	13	72.22	84.31

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Marshall	1205	1,701,833	113,020	1,814,853	208	15,776	17.26	1.24	7.21	3.32	19.23	7.47	43.27	3.82	22.12	1.41	8.17	44	3.65	36	81.82	95.31
Marshfield	5095	4,820,968	384,515	5,205,483	544	17,105	10.68	1.12	10.48	1.00	9.38	4.93	46.14	2.61	24.45	1.02	9.56	116	2.28	45	38.79	76.74
Mauston	1829	1,685,266	146,566	1,831,832	245	15,004	13.40	1.53	11.43	2.19	16.33	6.07	45.31	1.97	14.69	1.64	12.24	47	2.57	31	65.96	73.68
Mayville	1630	2,014,399	123,821	2,138,220	211	17,577	12.94	1.10	8.53	2.09	16.11	5.83	45.02	2.58	19.91	1.35	10.43	28	1.72	21	75.00	91.43
McFarland	1951	2,178,429	181,308	2,359,737	300	15,399	15.38	0.62	3.99	1.28	8.31	7.43	48.16	4.05	26.25	2.00	12.96	54	2.77	49	90.74	87.91
Medford Area	2712	2,218,996	187,031	2,406,027	261	16,438	9.62	1.29	13.41	1.29	13.41	3.54	36.78	2.43	25.29	1.07	11.11	60	2.21	37	61.67	77.01
Mellen	350	537,435	37,105	574,540	70	17,691	20.00	*	N/A	2.00	10.00	9.14	45.71	5.43	27.14	3.43	17.14	22	6.29	10	45.45	86.21
Melrose-Mindoro	729	694,403	55,070	749,473	87	15,585	11.93	1.23	10.34	*	N/A	6.31	52.87	2.33	19.54	2.06	17.24	14	1.92	10	71.43	76.67
Menasha	4334	4,019,597	320,621	4,340,218	519	15,934	11.98	1.02	8.48	1.41	11.75	5.10	42.58	3.35	27.94	1.11	9.25	176	4.06	85	48.30	92.72
Menominee Indian	991	2,719,438	176,803	2,896,241	300	23,844	30.27	2.52	8.33	5.05	16.67	14.73	48.67	6.66	22	1.31	4.33	41	4.14	36	87.80	90.91
Menomonee Falls	5849	5,672,171	340,185	6,012,356	519	20,125	8.87	0.63	7.12	0.97	10.96	3.61	40.61	2.36	26.54	1.30	14.62	158	2.70	114	72.15	92.05
Menomonie Area	3761	3,583,223	303,731	3,886,954	471	15,839	12.52	1.62	12.95	1.49	11.89	5.56	44.37	2.63	21.02	1.22	9.77	124	3.30	63	50.81	74.30
Mequon-Thiensville	5082	4,657,812	258,000	4,915,812	379	21,491	7.46	0.31	4.22	0.81	10.82	2.48	33.25	2.28	30.61	1.57	21.11	77	1.52	73	94.81	86.98
Mercer	232	242,428	22,627	265,055	34	16,314	14.66	*	N/A	3.88	26.47	7.33	50	2.59	17.65	0.86	5.88	7	3.02	5	71.43	100.00
Merrill Area	4091	3,181,563	302,920	3,484,483	457	15,223	11.17	1.61	14.44	1.03	9.19	5.33	47.7	2.20	19.69	1.00	8.97	90	2.20	54	60.00	67.48
Merton Community	841	505,797	38,369	544,166	63	15,572	7.49	*	N/A	*	N/A	3.92	52.38	2.26	30.16	1.31	17.46	24	2.85	16	66.67	72.22
Middleton-Cross Plains	5362	6,157,376	438,358	6,595,734	692	17,368	12.91	0.63	4.91	1.04	8.08	5.39	41.72	3.84	29.73	2.00	15.44	143	2.67	100	69.93	70.87
Milton	2991	3,105,156	203,584	3,308,740	312	17,536	10.43	1.00	9.62	1.57	15.06	3.34	32.05	3.71	35.58	0.80	7.69	72	2.41	46	63.89	71.39
Milwaukee	123,011	140,257,829	9,975,411	150,233,240	16,130	17,445	13.11	2.09	15.94	1.26	9.61	4.75	36.23	2.21	16.86	2.80	21.36	4096	3.33	2,481	60.57	86.48
Mineral Point	871	802,896	69,316	872,212	101	16,003	11.60	1.03	8.91	1.38	11.88	5.17	44.55	2.76	23.76	1.26	10.89	15	1.72	7	46.67	80.95
Minocqua J1	762	670,466	51,458	721,924	83	15,514	10.89	1.31	12.05	2.23	20.48	5.12	46.99	1.18	10.84	1.05	9.64	25	3.28	19	76.00	100.00
Mishicot	1331	959,346	99,701	1,059,047	184	12,077	13.82	0.98	7.07	1.73	12.50	5.18	37.5	4.28	30.98	1.65	11.96	55	4.13	37	67.27	80.56
Mondovi	1114	1,469,102	82,313	1,551,415	148	17,302	13.29	0.99	7.43	*	N/A	6.19	46.62	4.13	31.08	1.97	14.86	35	3.14	31	88.57	88.89
Monona Grove	2923	3,110,629	226,137	3,336,766	368	17,721	12.59	0.68	5.43	2.05	16.30	4.24	33.7	3.69	29.35	1.92	15.22	78	2.67	51	65.38	65.79
Monroe	2838	4,412,348	298,579	4,710,927	495	17,521	17.44	2.01	11.52	2.54	14.55	7.86	45.05	4.16	23.84	0.88	5.05	103	3.63	70	67.96	93.45
Montello	918	898,882	75,293	974,175	125	15,040	13.62	1.74	12.8	3.16	23.20	5.99	44	1.96	14.4	0.76	5.6	14	1.53	9	64.29	76.47
Monticello	437	386,759	32,481	419,240	46	16,886	10.53	*	N/A	1.83	17.39	4.58	43.48	1.60	15.22	2.52	23.91	7	1.60	3	42.86	88.89
Mosinee	2170	2,224,906	178,914	2,403,820	305	15,909	14.06	1.94	13.77	2.21	15.74	6.82	48.52	1.47	10.49	1.61	11.48	63	2.90	43	68.25	93.02
Mount Horeb Area	1979	1,751,421	134,843	1,886,264	208	16,086	10.51	0.91	8.65	1.06	10.10	4.14	39.42	3.23	30.77	1.16	11.06	55	2.78	30	54.55	82.05
Mukwonago	5660	6,137,762	416,810	6,554,572	641	17,433	11.33	0.72	6.4	1.64	14.51	5.00	44.15	2.58	22.78	1.38	12.17	157	2.77	124	78.98	75.00

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Muskego-Norway	5137	5,561,589	324,630	5,886,219	547	18,547	10.65	0.47	4.39	1.44	13.53	4.98	46.8	2.12	19.93	1.64	15.36	141	2.74	97	68.79	91.94
Neecdah Area	862	721,839	66,476	788,315	104	15,289	12.06	1.39	11.54	1.51	12.50	5.92	49.04	1.28	10.58	1.97	16.35	29	3.36	15	51.72	81.08
Neenah	7939	7,942,996	576,551	8,519,547	903	17,176	11.37	1.31	11.52	1.68	14.73	4.52	39.76	2.54	22.37	1.32	11.63	155	1.95	109	70.32	57.34
Neillsville	1361	2,037,777	135,185	2,172,962	205	17,968	15.06	2.28	15.12	2.50	16.59	6.69	44.39	0.81	5.37	2.79	18.54	52	3.82	26	50.00	86.67
Nekoosa	1614	1,493,625	126,846	1,620,471	199	15,024	12.33	1.18	9.55	2.04	16.58	6.20	50.25	1.98	16.08	0.93	7.54	56	3.47	37	66.07	89.19
Neosho J3	227	378,677	25,659	404,336	36	20,659	15.86	*	N/A	*	N/A	7.05	44.44	6.17	38.89	2.64	16.67	12	5.29	9	75.00	75.00
New Auburn	346	747,962	51,354	799,316	80	19,414	23.12	*	N/A	1.73	7.50	12.43	53.75	5.78	25	3.18	13.75	14	4.05	8	57.14	90.32
New Berlin	5314	6,802,732	424,738	7,227,470	620	21,399	11.67	0.75	6.45	1.86	15.97	5.27	45.16	2.75	23.55	1.04	8.87	138	2.60	98	71.01	76.32
New Glarus	785	1,141,565	69,354	1,210,919	126	16,901	16.05	*	N/A	2.68	16.67	4.97	30.95	7.01	43.65	1.40	8.73	15	1.91	13	86.67	86.67
New Holstein	1864	789,751	133,915	923,666	191	11,715	10.25	*	N/A	0.48	4.71	4.67	45.55	4.45	43.46	0.64	6.28	51	2.74	37	72.55	81.43
New Lisbon	714	780,542	54,299	834,841	74	19,002	10.36	1.40	13.51	*	N/A	5.04	48.65	1.68	16.22	2.24	21.62	30	4.20	22	73.33	77.78
New London	3046	2,060,507	187,235	2,247,742	292	14,663	9.59	0.95	9.93	1.18	12.33	4.40	45.89	2.10	21.92	0.95	9.93	85	2.79	57	67.06	85.57
New Richmond	2574	2,261,468	201,513	2,462,981	342	14,441	13.29	1.09	8.19	1.90	14.33	6.10	45.91	2.21	16.67	1.98	14.91	66	2.56	44	66.67	83.96
Niagara	575	776,219	49,061	825,280	66	21,189	11.48	1.57	13.64	1.74	15.15	3.48	30.3	3.30	28.79	1.39	12.12	27	4.70	13	48.15	75.00
Nicolet UHS	1353	1,747,961	82,283	1,830,244	132	26,252	9.76	1.03	10.61	2.14	21.97	5.03	51.52	0.44	4.55	1.11	11.36	5	0.37	4	80.00	97.67
Norris	111	701,513	27,502	729,015	35	25,534	31.53	*	N/A	21.62	68.57	7.21	22.86	*	N/A	2.70	8.57	4	3.60	1	25.00	90.00
North Cape	193	4,971	12,712	17,683	23	6,137	11.92	*	N/A	*	N/A	6.22	52.17	*	N/A	5.70	47.83	9	4.66	6	66.67	83.33
North Crawford	652	698,496	56,669	755,165	84	16,475	12.88	2.15	16.67	1.99	15.48	5.98	46.43	1.84	14.29	0.92	7.14	30	4.60	22	73.33	86.96
North Fond du Lac	1312	1,772,927	124,757	1,897,684	183	17,585	13.95	1.22	8.74	2.52	18.03	7.16	51.37	2.21	15.85	0.84	6.01	42	3.20	33	78.57	78.57
North Lake	423	252,542	22,414	274,956	32	15,930	7.57	*	N/A	*	N/A	3.31	43.75	2.36	31.25	1.89	25	9	2.13	9	100.00	69.23
Northern Ozaukee	988	1,085,191	77,565	1,162,756	108	18,818	10.93	*	N/A	1.32	11.96	3.64	33.03	4.76	43.12	1.21	11.01	22	2.23	12	54.55	80.65
Northland Pines	1723	1,699,207	124,565	1,823,772	193	17,801	11.20	0.99	8.81	2.61	23.32	4.64	41.45	1.86	16.58	1.10	9.84	63	3.66	32	50.79	86.15
Northwood	412	567,487	40,081	607,568	80	16,166	19.42	*	N/A	3.16	16.25	11.65	60	2.43	12.5	2.18	11.25	10	2.43	5	50.00	88.24
Norwalk-Ontario-Wilton	727	508,254	50,472	558,726	97	11,926	13.34	11.38	85.57	1.93	14.43	6.05	45.36	3.03	22.68	0.96	7.22	31	4.26	21	67.74	73.17
Norway J7	137	0	9,958	9,958	10	10,134	7.30	*	N/A	*	N/A	*	N/A	*	N/A	7.30	100	12	8.76	9	75.00	33.33
Oak Creek-Franklin	5508	5,384,040	350,104	5,734,144	552	17,590	10.02	1.05	10.51	0.94	9.42	4.03	40.22	3.34	33.33	0.65	6.52	154	2.80	124	80.52	79.38
Oakfield	713	575,494	47,369	622,863	62	17,180	8.70	*	N/A	1.12	12.90	4.07	46.77	2.38	27.42	1.12	12.9	20	2.81	17	85.00	76.92
Oconomowoc Area	5080	4,527,949	383,998	4,911,947	651	15,375	12.81	1.12	8.76	1.20	9.37	5.93	46.24	2.36	18.43	2.20	17.2	154	3.03	122	79.22	94.59
Oconto Falls	2051	1,782,523	201,166	1,983,689	336	13,352	16.38	0.93	5.64	2.24	13.63	7.26	44.21	5.12	31.16	0.83	5.04	75	3.66	44	58.67	73.15
Oconto	1389	1,162,940	144,230	1,307,170	213	12,774	15.33	1.58	10.33	2.52	16.43	6.48	42.25	3.10	20.19	1.66	10.8	58	4.18	37	63.79	54.39

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Omro	1239	1,842,201	124,613	1,966,814	196	17,559	15.82	1.37	8.63	1.21	7.61	5.86	36.54	6.78	42.64	0.65	4.06	62	5.00	41	66.13	78.00
Onalaska	3278	2,270,148	177,160	2,447,308	257	16,855	7.84	0.88	11.28	1.01	12.84	3.05	38.91	2.14	27.24	0.76	9.73	102	3.11	66	64.71	78.41
Oostburg	1123	671,148	71,545	742,693	102	14,143	9.08	*	N/A	0.53	5.88	3.38	37.25	3.29	36.27	1.87	20.59	23	2.05	15	65.22	86.96
Oregon	3430	4,258,713	273,248	4,531,961	454	17,888	13.24	0.85	6.36	2.04	15.35	6.09	45.83	2.68	20.18	1.57	11.81	120	3.50	60	50.00	75.69
Osceola	1725	1,341,768	123,288	1,465,056	191	14,238	11.07	0.64	5.76	1.22	10.99	5.22	47.12	2.32	20.94	1.68	15.18	40	2.32	27	67.50	89.23
Oshkosh Area	12,457	13,843,646	933,139	14,776,785	1502	17,269	12.06	1.49	12.38	1.70	14.11	4.82	39.92	3.64	30.14	0.41	3.40	136	1.09	95	69.85	95.04
Osseo-Fairchild	985	1,207,562	99,004	1,306,566	166	15,422	16.85	1.83	10.84	1.22	7.23	9.85	58.43	3.55	21.08	0.41	2.41	20	2.03	9	45.00	79.55
Owen-Withee	684	836,055	61,164	897,219	102	16,551	14.91	0.88	5.88	3.22	21.57	5.99	40.20	4.24	28.43	0.58	3.92	38	5.56	26	68.42	56.52
Palmyra-Eagle Area	1188	1,451,200	96,224	1,547,424	163	17,636	13.72	1.09	7.98	1.85	13.50	5.72	41.72	2.95	21.47	2.10	15.34	24	2.02	21	87.50	48.15
Pardeeville Area	982	888,814	74,599	963,413	130	13,872	13.24	2.24	16.92	2.55	19.23	5.09	38.46	2.55	19.23	0.81	6.15	50	5.09	23	46.00	93.33
Paris J1	292	207,590	14,925	222,515	23	17,382	7.88	*	N/A	*	N/A	*	N/A	5.48	69.57	2.40	30.43	9	3.08	7	77.78	80.00
Park Falls	1058	898,400	85,531	983,931	140	14,084	13.23	1.23	9.29	2.08	15.71	6.33	47.86	3.12	23.57	0.47	3.57	20	1.89	16	80.00	78.79
Parkview	1154	1,270,161	109,357	1,379,518	171	16,321	14.82	0.95	6.43	1.47	9.94	6.67	45.03	3.99	26.9	1.73	11.7	63	5.46	43	68.25	70.37
Pecatonica Area	514	522,179	46,771	568,950	84	14,480	16.34	1.17	7.14	1.17	7.14	9.34	57.14	3.11	19.05	1.56	9.52	22	4.28	20	90.91	91.67
Pepin Area	328	468,010	29,926	497,936	42	20,033	12.80	*	N/A	*	N/A	7.62	59.52	*	N/A	5.18	40.48	14	4.27	6	42.86	83.33
Peshtigo	1259	1,103,360	100,371	1,203,731	154	15,124	12.23	1.11	9.03	1.11	9.03	5.24	42.58	3.26	26.48	1.51	12.26	50	3.97	34	68.00	97.83
Pewaukee	2272	2,704,798	173,387	2,878,185	273	18,751	12.02	0.79	6.59	1.72	14.29	5.99	49.82	2.24	18.68	1.28	10.62	69	3.04	45	65.22	77.50
Phelps	195	160,426	17,445	177,871	24	18,335	12.31	*	N/A	4.10	33.33	5.64	45.83	*	N/A	2.56	20.83	7	3.59	1	14.29	66.67
Phillips	1197	960,741	79,236	1,039,977	111	16,727	9.27	1.59	17.12	0.92	9.91	5.01	54.05	0.84	9.01	0.92	9.91	40	3.34	18	45.00	79.49
Pittsville	829	875,376	66,186	941,562	97	16,444	11.70	3.02	25.77	1.45	12.37	5.07	43.3	1.45	12.37	0.72	6.19	11	1.33	5	45.45	96.00
Platteville	1798	2,189,261	182,271	2,371,532	281	16,658	15.63	2.45	15.66	1.06	6.76	7.06	45.2	3.62	23.13	1.45	9.25	57	3.17	42	73.68	77.78
Plum City	427	405,958	35,971	441,929	66	14,463	15.46	1.41	9.09	*	N/A	7.49	48.48	3.98	25.76	2.58	16.67	10	2.34	9	90.00	78.26
Plymouth	3044	2,896,118	242,141	3,138,259	372	15,454	12.22	1.02	8.33	1.45	11.83	5.09	41.67	3.19	26.08	1.48	12.1	88	2.89	46	52.27	74.32
Port Edwards	515	457,151	35,176	492,327	57	16,863	11.07	1.75	15.79	1.17	10.53	5.05	45.61	2.72	24.56	0.39	3.51	25	4.85	15	60.00	100.00
Port Washington-Saukville	3090	3,135,653	232,054	3,367,707	354	17,658	11.46	1.00	8.76	1.52	13.28	4.30	37.57	3.33	29.1	1.29	11.3	100	3.24	53	53.00	74.24
Portage Community	2882	2,840,017	234,939	3,074,956	383	15,095	13.29	0.62	4.7	1.91	14.36	5.34	40.21	3.82	28.72	1.60	12.01	133	4.61	74	55.64	96.82
Potosi	508	575,117	49,169	624,286	83	15,892	16.34	2.17	13.25	2.36	14.46	7.48	45.78	4.13	25.3	0.20	1.2	33	6.50	17	51.52	86.67
Poynette	1114	956,248	87,278	1,043,526	134	15,201	12.03	0.72	5.97	1.62	13.43	4.13	34.33	3.59	29.85	1.97	16.42	24	2.15	18	75.00	72.73
Prairie Farm	351	241,596	33,699	275,295	48	14,249	13.68	*	N/A	*	N/A	7.12	52.08	3.42	25	3.13	22.92	10	2.85	6	60.00	88.24

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Prairie du Chien Area	1809	1,320,541	145,980	1,466,521	226	15,123	12.49	2.49	19.91	0.83	6.64	6.63	53.1	1.93	15.49	0.61	4.87	50	2.76	40	80.00	87.80
Prentice	569	638,710	47,800	686,510	68	17,277	11.95	2.81	23.53	2.28	19.12	3.16	26.47	2.64	22.06	1.05	8.82	18	3.16	14	77.78	77.78
Prescott	1372	1,360,651	105,513	1,466,164	173	15,896	12.61	1.97	15.61	1.68	13.29	5.83	46.24	1.46	11.56	1.68	13.29	42	3.06	27	64.29	73.08
Princeton	637	345,253	52,264	397,517	83	12,233	13.03	*	N/A	1.57	12.05	7.38	56.63	3.45	26.51	0.63	4.82	13	2.04	8	61.54	75.00
Pulaski Community	3585	3,710,729	259,709	3,970,438	469	15,644	13.08	0.59	4.48	2.18	16.63	5.72	43.71	2.79	21.32	1.81	13.86	71	1.98	52	73.24	82.52
Racine	25,898	33,812,766	2,255,473	36,068,239	3480	18,250	13.44	1.63	12.19	2.15	15.97	5.02	37.28	3.58	26.58	1.06	7.89	731	2.82	583	79.75	87.69
Randall J1	689	510,862	45,969	556,831	76	14,605	11.03	*	N/A	0.87	7.89	5.81	52.63	2.76	25	1.60	14.47	18	2.61	11	61.11	77.78
Randolph	680	533,409	44,877	578,286	76	16,247	11.18	1.18	10.53	1.03	9.21	5.15	46.05	3.38	30.26	0.44	3.95	18	2.65	8	44.44	93.10
Random Lake	1298	1,516,356	128,044	1,644,400	184	16,644	14.18	1.00	7.07	2.47	17.39	5.01	35.33	4.24	29.89	1.46	10.33	33	2.54	25	75.76	90.20
Raymond #14	390	3,850	36,243	40,093	55	7,173	14.10	*	N/A	2.05	14.55	8.46	60	2.05	14.55	1.54	10.91	33	8.46	19	57.58	83.33
Reedsburg	2880	2,522,973	257,383	2,780,356	393	14,102	13.65	2.05	15.01	1.94	14.25	5.76	42.24	3.30	24.17	0.59	4.33	112	3.89	59	52.68	94.17
Reedsville	1032	717,116	77,048	794,164	105	14,552	10.17	1.45	14.29	0.58	5.71	3.68	36.19	3.49	34.29	0.97	9.52	46	4.46	35	76.09	76.92
Rhinelander	3775	3,262,322	254,755	3,517,077	355	17,615	9.40	0.77	8.17	1.62	17.18	3.07	32.68	2.94	31.27	1.01	10.7	137	3.63	59	43.07	90.99
Rib Lake	584	440,758	49,873	490,631	79	13,580	13.53	1.54	11.39	1.20	8.86	8.22	60.76	1.54	11.39	1.03	7.59	21	3.60	10	47.62	90.91
Rice Lake Area	2899	3,358,458	252,419	3,610,877	380	16,751	13.11	1.83	13.95	1.14	8.68	7.49	57.11	1.72	13.16	0.93	7.11	66	2.28	55	83.33	81.75
Richfield J1	644	601,414	29,772	631,186	46	21,506	7.14	*	N/A	1.09	15.22	2.95	41.3	2.33	32.61	0.78	10.87	23	3.57	12	52.17	70.59
Richland	1857	2,458,903	213,945	2,672,848	340	16,314	18.31	1.88	10.29	2.05	11.18	9.32	50.88	4.42	24.12	0.65	3.53	90	4.85	52	57.78	75.24
Richmond	407	197,651	21,417	219,068	50	12,598	12.29	*	N/A	*	N/A	3.69	30	5.41	44	3.19	26	13	3.19	8	61.54	80.00
Rio Community	571	757,989	54,073	812,062	97	15,999	16.99	1.40	8.25	3.33	19.59	7.88	46.39	3.33	19.59	1.05	6.19	9	1.58	6	66.67	94.12
Ripon	1731	2,353,275	154,670	2,507,945	249	17,769	14.38	0.81	5.62	2.60	18.07	7.45	51.81	2.66	18.47	0.87	6.02	45	2.60	29	64.44	81.52
River Falls	3253	3,333,929	251,391	3,585,320	352	17,118	10.82	1.69	15.63	1.75	16.19	4.37	40.34	2.15	19.89	0.86	7.95	119	3.66	72	60.50	72.58
River Ridge	744	549,229	59,950	609,179	85	16,354	11.42	0.94	8.24	*	N/A	4.57	40	5.11	44.71	0.81	7.06	15	2.02	11	73.33	86.67
River Valley	1773	2,178,689	165,554	2,344,243	262	16,600	14.78	1.18	8.02	1.30	8.78	7.28	49.24	2.43	16.41	2.59	17.56	63	3.55	44	69.84	86.67
Riverdale	952	911,116	98,939	1,010,055	151	14,665	15.86	1.79	11.26	2.00	12.58	6.83	43.05	4.10	25.83	1.16	7.28	35	3.68	22	62.86	69.23
Rosendale-Brandon	1028	745,548	67,187	812,735	101	16,030	9.82	1.07	10.89	*	N/A	4.57	46.53	2.92	29.7	1.26	12.87	118	1.75	59	50.00	89.47
Rosholt	815	433,159	64,988	498,147	102	12,067	12.52	1.10	8.82	1.72	13.73	6.38	50.98	2.82	22.55	0.49	3.92	8	0.98	3	37.50	61.11
Royall	731	760,387	72,771	833,158	119	16,026	16.28	1.64	10.08	1.09	6.72	8.62	52.94	3.83	23.53	1.09	6.72	38	5.20	23	60.53	76.92
Rubicon J6	146	80,239	9,005	89,244	20	12,700	13.70	*	N/A	*	N/A	8.90	65	*	N/A	4.79	35	7	4.79	6	85.71	60.00
Saint Croix Central	968	1,123,562	79,175	1,202,737	132	16,380	13.64	1.65	12.12	3.41	25.00	5.06	37.12	2.58	18.94	0.93	6.82	41	4.24	35	85.37	82.05
Saint Croix Falls	1168	993,372	94,860	1,088,232	150	14,751	12.84	0.86	6.67	2.65	20.67	5.05	39.33	2.83	22	1.46	11.33	36	3.08	29	80.56	73.08

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Saint Francis	2215	2,012,151	123,342	2,135,493	168	20,222	7.58	0.72	9.52	1.31	17.26	2.53	33.33	1.72	22.62	1.31	17.26	37	1.67	22	59.46	80.65
Salem J2	1112	1,367,318	71,013	1,438,331	119	18,777	10.70	*	N/A	1.17	10.92	3.69	34.45	3.78	35.29	2.07	19.33	41	3.69	16	39.02	78.05
Sauk Prairie	2793	2,951,217	251,672	3,202,889	430	15,012	15.40	0.79	5.12	1.36	8.84	8.31	53.95	3.54	23.02	1.40	9.07	114	4.08	57	50.00	74.83
Seneca	377	285,189	32,199	317,388	47	15,348	12.47	*	N/A	*	N/A	7.69	61.7	2.39	19.15	2.39	19.15	7	1.86	7	100.00	88.24
Sevastopol	767	796,052	66,926	862,978	98	18,099	12.78	0.91	7.14	1.69	13.27	4.82	37.76	4.69	36.73	0.65	5.1	31	4.04	20	64.52	91.67
Seymour Community	2591	1,935,803	175,006	2,110,809	306	13,823	11.81	1.16	9.8	2.05	17.32	4.48	37.91	2.89	24.51	1.24	10.46	66	2.55	50	75.76	84.75
Sharon J11	288	78,723	43,356	122,079	69	9,404	23.96	3.82	15.94	2.08	8.70	11.81	49.28	5.21	21.74	1.04	4.35	17	5.90	12	70.59	66.67
Shawano-Gresham	3455	3,748,821	251,404	4,000,225	447	15,812	12.94	0.81	6.26	1.71	13.20	5.93	45.86	3.56	27.52	0.93	7.16	124	3.59	86	69.35	84.56
Sheboygan Area	12,256	12,479,709	902,084	13,381,793	1489	17,184	12.15	1.30	10.68	2.41	19.81	4.12	33.92	2.72	22.36	1.61	13.23	391	3.19	293	74.94	84.36
Sheboygan Falls	1840	2,530,277	125,568	2,655,845	192	20,996	10.43	1.20	11.46	1.47	14.06	4.18	40.1	2.83	27.08	0.76	7.29	50	2.72	45	90.00	92.68
Shell Lake	575	565,458	60,939	626,397	91	15,761	15.83	1.22	7.69	2.43	15.38	5.57	35.16	5.57	35.16	1.04	6.59	9	1.57	7	77.78	84.38
Shiocton	834	783,817	72,668	856,485	122	14,411	14.63	2.16	14.75	1.56	10.66	7.67	52.46	2.28	15.57	0.96	6.56	21	2.52	16	76.19	82.86
Shorewood	2611	2,353,097	136,608	2,489,705	189	22,287	7.24	0.46	6.35	0.96	13.23	3.06	42.33	2.37	32.8	0.38	5.29	33	1.26	26	78.79	87.23
Shullsburg	431	548,240	47,372	595,612	71	16,267	16.47	3.48	21.13	*	N/A	6.73	40.85	4.41	26.76	1.86	11.27	15	3.48	9	60.00	79.17
Silver Lake J1	603	559,592	45,564	605,156	89	14,078	14.76	*	N/A	*	N/A	5.64	38.2	5.14	34.83	3.98	26.97	17	2.82	12	70.59	82.14
Siren	509	590,915	51,972	642,887	72	17,638	14.15	*	N/A	1.38	9.72	3.73	26.39	5.70	40.28	3.34	23.61	30	5.89	20	66.67	91.43
Slinger	2884	2,317,375	188,843	2,506,218	308	14,814	10.68	0.76	7.14	1.32	12.34	5.72	53.57	2.05	19.16	0.83	7.79	56	1.94	43	76.79	87.50
Solon Springs	400	647,419	43,143	690,562	76	17,954	19.00	*	N/A	2.00	10.53	11.75	61.84	3.50	18.42	1.75	9.21	6	1.50	5	83.33	100.00
Somerset	1280	1,348,679	85,718	1,434,397	140	16,883	10.94	0.70	6.43	2.58	23.57	4.53	41.43	1.80	16.43	1.33	12.14	29	2.27	17	58.62	78.26
South Milwaukee	4262	3,674,102	284,907	3,959,009	411	17,093	9.64	0.56	5.84	0.82	8.52	4.60	47.69	2.35	24.33	1.31	13.63	94	2.20	69	73.40	74.48
South Shore	246	560,876	29,086	589,962	51	22,735	20.73	2.85	13.73	3.66	17.65	8.54	41.18	3.25	15.69	2.44	11.76	11	4.47	9	81.82	86.96
Southern Door	1327	1,835,543	120,097	1,955,640	189	18,088	14.24	0.98	6.88	2.11	14.81	6.78	47.62	2.79	19.58	1.58	11.11	39	2.94	21	53.85	91.67
Southwestern Wisconsin	765	897,918	66,627	964,545	93	18,485	12.16	1.44	11.83	1.31	10.75	4.71	38.71	3.53	29.03	1.18	9.68	24	3.14	12	50.00	67.57
Sparta Area	3054	2,572,733	233,122	2,805,855	383	14,297	12.54	2.29	18.28	2.26	18.02	4.88	38.9	1.77	14.1	1.34	10.7	82	2.69	42	51.22	81.82
Spencer	900	407,550	64,766	472,316	92	12,453	10.22	1.22	11.96	1.33	13.04	5.44	53.26	2.00	19.57	0.22	2.17	18	2.00	15	83.33	82.22
Spooner	1777	2,331,911	162,050	2,493,961	248	17,227	13.96	1.74	12.5	1.80	12.90	5.40	38.71	3.71	26.61	1.29	9.27	45	2.53	27	60.00	79.49
Spring Valley	733	735,647	64,112	799,759	113	14,528	15.42	1.36	8.85	0.95	6.19	7.09	46.02	3.96	25.66	2.05	13.27	22	3.00	14	63.64	82.05
Stanley-Boyd Area	1191	2,031,451	108,303	2,139,754	157	21,580	13.18	1.34	10.19	1.68	12.74	6.38	48.41	2.10	15.92	1.68	12.74	47	3.95	34	72.34	77.50
Stevens Point Area	9212	9,518,954	696,814	10,215,768	1025	17,710	11.13	1.10	9.84	1.12	10.05	5.03	45.13	2.92	26.22	0.97	8.67	210	2.28	108	51.43	57.85
Stockbridge	265	260,837	22,852	283,689	32	17,313	12.08	*	N/A	*	N/A	5.28	43.75	2.64	21.88	4.15	34.38	9	3.40	6	66.67	90.91

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Stone Bank	313	336,967	23,249	360,216	36	19,063	11.50	*	N/A	*	N/A	7.99	69.44	*	N/A	3.51	30.56	12	3.83	9	75.00	90.00
Stoughton Area	3969	4,240,527	356,034	4,596,561	635	14,376	16.00	1.84	11.5	2.65	16.54	6.10	38.11	3.33	20.79	2.09	13.07	149	3.75	114	76.51	83.96
Stratford	884	365,318	60,385	425,703	81	11,921	9.16	0.68	7.41	1.36	14.81	4.41	48.15	2.15	23.46	0.57	6.17	15	1.70	12	80.00	82.14
Sturgeon Bay	1777	1,790,590	136,263	1,926,853	210	16,898	11.82	1.29	10.95	2.53	21.43	4.11	34.76	3.04	25.71	0.84	7.14	51	2.87	28	54.90	75.00
Sun Prairie Area	5347	6,530,258	422,363	6,952,621	724	17,809	13.54	1.25	9.25	1.74	12.85	4.38	32.32	4.38	32.32	1.80	13.26	190	3.55	135	71.05	93.72
Superior	5683	6,468,476	437,375	6,905,851	650	18,318	11.44	1.78	15.54	1.58	13.85	4.06	35.54	2.38	20.77	1.64	14.31	156	2.75	70	44.87	70.33
Suring	745	745,824	75,411	821,235	118	14,793	15.84	1.34	8.47	1.74	11.02	8.86	55.93	3.09	19.49	0.81	5.08	16	2.15	12	75.00	80.00
Swallow	345	171,169	14,944	186,113	18	18,601	5.22	*	N/A	*	N/A	3.19	61.11	1.74	33.33	0.29	5.56	16	4.64	9	56.25	33.33
Thorp	873	812,083	51,445	863,528	82	18,790	9.39	0.92	9.76	*	N/A	4.47	47.56	2.98	31.71	1.03	10.98	19	2.12	12	63.16	94.74
Three Lakes	792	946,373	60,116	1,006,489	95	18,652	11.99	0.76	6.32	1.64	13.68	5.81	48.42	2.40	20	1.39	11.58	19	2.40	11	57.89	92.50
Tigerton	419	437,935	46,467	484,402	83	14,549	19.81	*	N/A	2.15	10.84	10.02	50.6	5.49	27.71	2.15	10.84	12	2.86	8	66.67	63.33
Tomah Area	3590	2,603,949	242,172	2,846,121	358	14,722	9.97	1.95	19.55	1.11	11.17	4.12	41.34	1.95	19.55	0.84	8.38	96	2.67	63	65.63	71.54
Tomahawk	1782	1,561,637	123,907	1,685,544	174	17,062	9.76	1.18	12.07	1.29	13.22	4.43	45.4	1.80	18.39	1.07	10.92	43	2.41	28	65.12	88.89
Tomorrow River	883	803,836	81,322	885,158	111	15,890	12.57	*	N/A	*	N/A	6.00	47.75	4.08	32.43	2.49	19.82	27	3.06	15	55.56	76.67
Trevor Grade	366	406,125	26,915	433,040	62	15,525	16.94	*	N/A	*	N/A	10.38	61.29	3.28	19.35	3.28	19.35	28	7.65	10	35.71	92.86
Tri-County Area	873	724,528	72,790	797,318	125	14,181	14.32	1.49	10.4	1.49	10.40	7.33	51.2	2.86	20	1.15	8	30	3.44	23	76.67	75.76
Turtle Lake	632	561,669	55,929	617,598	88	13,939	13.92	2.53	18.18	*	N/A	6.17	44.32	2.85	20.45	2.37	17.05	28	4.43	14	50.00	76.32
Twin Lakes #4	399	488,755	39,222	527,977	76	14,715	19.05	*	N/A	*	N/A	11.78	61.84	4.51	23.68	2.76	14.47	13	3.26	8	61.54	86.67
Two Rivers	2594	2,230,757	194,525	2,425,282	326	14,897	12.57	1.85	14.72	1.97	15.64	4.66	37.12	2.89	23.01	1.20	9.51	75	2.89	49	65.33	86.90
Union Grove J1	778	0	46,921	46,921	86	6,779	11.05	*	N/A	2.19	19.77	5.14	46.51	2.06	18.6	1.67	15.12	31	3.98	21	67.74	76.92
Union Grove UHS	660	28,278	50,368	78,646	86	8,604	13.03	2.27	17.44	2.73	20.93	6.67	51.16	*	N/A	1.36	10.47	3	0.45	0	0.00	94.59
Unity	1239	1,344,331	99,229	1,443,560	174	15,861	14.04	0.89	6.32	1.86	13.22	8.15	58.05	2.26	16.09	0.89	6.32	57	4.60	31	54.39	74.07
Valders Area	1401	1,165,973	101,542	1,267,515	163	15,274	11.63	1.36	11.66	0.71	6.13	4.85	41.72	4.07	34.97	0.64	5.52	38	2.71	29	76.32	80.00
Verona Area	4361	5,566,652	291,313	5,857,965	501	19,809	11.49	0.80	6.99	1.03	8.98	4.24	36.93	2.64	22.95	2.77	24.15	100	2.29	68	68.00	80.30
Viroqua Area	1502	1,933,958	136,019	2,069,977	223	17,104	14.85	1.73	11.66	1.66	11.21	5.99	40.36	4.19	28.25	1.26	8.52	42	2.80	27	64.29	82.43
Wabeno Area	643	799,615	73,233	872,848	125	14,633	19.44	1.09	5.6	2.95	15.20	9.64	49.6	4.20	21.6	1.56	8	17	2.64	7	41.18	81.25
Walworth J1	539	88,936	37,587	126,523	73	8,092	13.54	1.30	9.59	1.67	12.33	4.27	31.51	5.57	41.1	0.74	5.48	25	4.64	18	72.00	60.71
Washburn	852	962,173	65,151	1,027,324	88	19,561	10.33	*	N/A	1.64	15.91	5.28	51.14	1.53	14.77	1.88	18.18	23	2.70	13	56.52	87.50
Washington	124	110,810	10,606	121,416	20	15,077	16.13	*	N/A	*	N/A	9.68	60	5.65	35	0.81	5	5	4.03	1	20.00	60.00
Washington-Caldwell	224	689	15,960	16,649	32	7,193	14.29	*	N/A	4.02	28.13	3.13	21.88	6.25	43.75	0.89	6.25	12	5.36	9	75.00	100.00

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Waterford Graded J1	1799	8,019	108,822	116,841	190	6,469	10.56	0.33	3.16	1.22	11.58	3.72	35.26	3.78	35.79	1.50	14.21	53	2.95	36	67.92	87.88
Waterford UHS	991	13,206	50,842	64,048	87	8,045	8.78	0.61	6.9	2.42	27.59	4.84	55.17	*	N/A	0.91	10.34	5	0.50	0	0.00	100.00
Waterloo	1110	1,371,664	93,835	1,465,499	158	16,860	14.23	0.90	6.33	2.07	14.56	5.95	41.77	4.68	32.91	0.63	4.43	65	5.86	52	80.00	82.22
Watertown	5998	5,154,149	407,726	5,561,875	640	16,524	10.67	1.77	16.56	1.75	16.41	4.50	42.19	1.62	15.16	1.03	9.69	184	3.07	127	69.02	79.29
Waukesha	15,722	17,963,806	1,087,010	19,050,816	1680	19,235	10.69	0.73	6.85	1.44	13.45	3.89	36.37	3.19	29.82	1.44	13.45	386	2.46	236	61.14	80.65
Waunakee Community	3213	2,931,881	209,028	3,140,909	344	16,274	10.71	0.59	5.52	1.31	12.21	5.60	52.33	2.33	21.8	0.87	8.14	85	2.65	64	75.29	83.64
Waupaca	2925	2,539,665	190,862	2,730,527	302	15,736	10.32	1.57	15.23	1.23	11.92	4.10	39.74	1.74	16.89	1.68	16.23	67	2.29	46	68.66	80.77
Waupun	2810	3,361,487	234,673	3,596,160	372	17,206	13.24	2.03	15.32	1.32	9.95	6.33	47.85	2.85	21.51	0.71	5.38	58	2.06	39	67.24	81.94
Wausau	10,787	11,295,473	777,500	12,072,973	1146	18,931	10.62	1.19	11.17	1.21	11.43	5.86	55.15	1.55	14.57	0.82	7.68	228	2.11	149	65.35	82.70
Wausaukee	788	719,692	64,831	784,523	115	15,059	14.59	*	N/A	0.89	6.09	7.36	50.43	3.68	25.22	2.66	18.26	30	3.81	20	66.67	88.64
Wautoma Area	1698	1,254,008	134,450	1,388,458	184	15,172	10.84	1.59	14.67	1.53	14.13	4.65	42.93	2.30	21.2	0.77	7.07	39	2.30	27	69.23	87.30
Wauwatosa	9520	7,470,040	492,430	7,962,470	635	20,578	6.67	0.40	5.98	0.79	11.81	2.18	32.76	2.25	33.7	1.05	15.75	175	1.84	128	73.14	93.83
Wauzeka-Steuben	377	388,185	42,802	430,987	76	14,273	20.16	*	N/A	*	N/A	7.96	39.47	7.96	39.47	4.24	21.05	15	3.98	11	73.33	65.38
Webster	778	994,540	74,267	1,068,807	134	16,056	17.22	*	N/A	2.44	14.18	8.23	47.76	2.70	15.67	3.86	22.39	54	6.94	24	44.44	85.29
West Allis	11,011	10,387,470	802,918	11,190,388	1268	17,072	11.52	1.24	10.8	1.37	11.90	5.70	49.49	2.21	19.15	1.00	8.67	260	2.36	199	76.54	91.48
West Bend	9073	6,622,303	519,240	7,141,543	803	15,947	8.85	0.68	7.72	1.47	16.56	2.82	31.88	2.95	33.37	0.93	10.46	218	2.40	91	41.74	64.23
West De Pere	2308	1,637,355	162,812	1,800,167	245	15,011	10.62	1.34	12.65	1.60	15.10	4.98	46.94	1.69	15.92	1.00	9.39	52	2.25	42	80.77	77.11
West Salem	1999	1,816,540	132,740	1,949,280	182	18,138	9.10	1.20	13.19	1.75	19.23	3.90	42.86	1.80	19.78	0.45	4.95	64	3.20	24	37.50	75.51
Westby Area	1272	1,004,613	96,162	1,100,775	132	15,701	10.38	1.18	11.36	1.10	10.61	4.17	40.15	3.14	30.3	0.79	7.58	44	3.46	26	59.09	77.78
Westfield	1412	1,262,952	142,914	1,405,866	256	12,517	18.13	1.63	8.98	3.12	17.19	9.14	50.39	3.26	17.97	0.99	5.47	57	4.04	37	64.91	80.95
Weston	430	345,996	44,040	390,036	79	11,829	18.37	*	N/A	2.79	15.19	10.23	55.7	4.42	24.05	0.93	5.06	15	3.49	9	60.00	72.50
Weyauwega-Fremont	1315	1,338,968	106,568	1,445,536	145	17,845	11.03	1.60	14.48	1.52	13.79	4.49	40.69	1.83	16.55	1.60	14.48	37	2.81	35	94.59	84.31
Weyerhaeuser Area	250	392,752	20,081	412,833	34	20,731	13.60	*	N/A	*	N/A	7.20	52.94	*	N/A	6.40	47.06	7	2.80	3	42.86	90.00
Wheatland J1	602	506,738	45,758	552,496	83	14,128	13.79	*	N/A	*	N/A	6.81	49.4	3.82	27.71	3.16	22.89	20	3.32	10	50.00	82.35
White Lake	325	373,188	25,789	398,977	45	16,942	13.85	2.15	15.56	2.46	17.78	4.92	35.56	2.77	20	1.54	11.11	5	1.54	3	60.00	87.50
Whitefish Bay	3962	2,979,907	150,554	3,130,461	194	25,063	4.90	0.20	4.12	0.50	10.31	1.41	28.87	2.09	42.78	0.68	13.92	59	1.49	49	83.05	78.48
Whitehall	757	821,807	67,546	889,353	103	16,349	13.61	2.25	16.5	0.92	6.80	7.00	51.46	1.59	11.65	1.85	13.59	16	2.11	10	62.50	60.47
Whitewater	2133	279,394	160,748	440,142	266	8,588	12.47	1.22	9.77	1.59	12.78	5.06	40.6	4.13	33.08	0.47	3.76	76	3.56	41	53.95	78.57
Whitnall	4002	2,779,919	194,166	2,974,085	267	19,529	6.67	0.37	5.62	0.65	9.74	2.42	36.33	2.02	30.34	1.20	17.98	94	2.35	44	46.81	90.00
Wild Rose	767	615,390	49,933	665,323	78	15,311	10.17	2.09	20.51	1.69	16.67	3.91	38.46	2.48	24.36	0.01	0	15	1.96	13	86.67	90.48

District Name	Total Students	Total State & District Special Ed. Expenditures (in dollars)	Total Federal flow-through funds	Total Spending (Federal, State, and District)	Students with Disabilities	Total Dollars per Disabled Student	Percent of Students with disability	Percent of Students as CD	Percent of Disabled Students as CD	Percent of Students as ED	Percent of Disabled Students as ED	Percent of Students as LD	Percent of Disabled Students as LD	Percent of Students as Speech and Language Disabled	Percent of Disabled Students as Speech and Language Disabled	Percent of Students as Low Incidence	Percent of Disabled Students as Low Incidence	Total initial referrals	Initial referral rate for total public/ non-public enrollment	Total place-ments	Rate of success-ful referrals	Reeval rate resulting in continued eligibility
Williams Bay	749	93,343	33,573	126,916	56	11,274	7.48	0.80	10.71	*	N/A	3.07	41.07	2.54	33.93	1.07	14.29	43	5.74	20	46.51	57.14
Wilmot Grade	137	178,779	11,614	190,393	16	20,151	11.68	*	N/A	*	N/A	6.57	56.25	4.38	37.5	0.73	6.25	3	2.19	3	100.00	100.00
Wilmot UHS	1040	953,824	67,593	1,021,417	132	15,689	12.69	*	N/A	2.02	15.91	8.65	68.18	*	N/A	2.02	15.91	0	0.00	0	0.00	93.62
Winneconne Community	1665	1,503,730	127,744	1,631,474	191	15,350	11.47	0.60	5.24	1.26	10.99	6.85	59.69	1.50	13.09	1.26	10.99	46	2.76	37	80.43	84.62
Winter	441	714,539	49,987	764,526	85	17,971	19.27	4.76	24.71	3.40	17.65	8.62	44.71	2.04	10.59	0.45	2.35	11	2.49	5	45.45	95.65
Wisconsin Dells	1877	1,868,516	174,242	2,042,758	285	14,662	15.18	1.28	8.42	2.18	14.39	7.88	51.93	3.09	20.35	0.75	4.91	51	2.72	24	47.06	88.51
Wisconsin Heights	1195	1,464,700	91,737	1,556,437	169	17,154	14.14	1.42	10.06	1.00	7.10	6.36	44.97	4.27	30.18	1.09	7.69	57	4.77	33	57.89	75.00
Wisconsin Rapids	7279	6,298,637	536,761	6,835,398	836	16,099	11.49	2.23	19.38	1.52	13.28	5.52	48.09	1.73	15.07	0.48	4.19	183	2.51	117	63.93	91.52
Wittenberg-Birnamwood	1549	1,498,027	104,119	1,602,146	175	16,345	11.30	1.42	12.57	1.55	13.71	6.58	58.29	1.61	14.29	0.13	1.14	42	2.71	22	52.38	70.59
Wonewoc-Union Center	521	335,945	35,695	371,640	56	13,484	10.75	1.54	14.29	1.54	14.29	5.76	53.57	1.15	10.71	0.77	7.14	11	2.11	5	45.45	94.44
Woodruff J1	614	998,249	43,911	1,042,160	74	22,670	12.05	*	N/A	2.93	24.32	4.56	37.84	3.26	27.03	1.30	10.81	27	4.40	17	62.96	70.27
Wrightstown Community	1260	696,187	89,420	785,607	139	12,697	11.03	1.43	12.95	1.03	9.35	5.95	53.96	1.90	17.27	0.71	6.47	59	4.68	25	42.37	95.83
Yorkville J2	353	2,220	26,383	28,603	41	7,894	11.61	*	N/A	*	N/A	5.67	48.78	3.40	29.27	2.55	21.95	17	4.82	9	52.94	66.67
Average	**2401**	**2,496,875**	**182,977**	**2,679,852**	**292**	**16,299**	**12.90**	**1.44**	**11.08**	**1.84**	**13.85**	**5.85**	**45.63**	**3.10**	**24.39**	**1.59**	**12.67**	**70**	**3.18**	**46**	**65.50**	**81.45**
Median	**1096**	**1,085,362**	**87,348**	**1,160,760**	**140**	**16,294**	**12.65**	**1.29**	**10.16**	**1.63**	**13.28**	**5.64**	**44.67**	**2.86**	**23.02**	**1.31**	**10.855**	**37**	**3.01**	**22**	**66.02**	**82.22**
Standard Deviation	**6724**	**7,954,606**	**539,510**	**8,488,511**	**876**	**3,405**	**3.31**	**0.89**	**5.99**	**1.34**	**5.52**	**1.93**	**17.89**	**1.26**	**8.95**	**1.14**	**9.40**	**217**	**1.29**	**136.04**	**15.87**	**11.58**
Totals	**1,022,899**	**1,063,668,808**	**77,948,140**	**1,141,616,948**	**124,505**													**29,769**		**19,601**		

NOTES

1. http://www2.dpi.state.wi.us/leareports/.

2. Wis. Stat. § 115.77(4) (1999-2000).

3. http://www2.dpi.state.wi.us/leareports/.

4. These include (with the number of special education students served primarily at these locations in 2000-01 listed in parentheses: the YW Global Career Academy (3), the Wisconsin Department of Corrections (622), the Wisconsin Department of Health & Family Services (163), and the Milwaukee Academy of Science (55). Incomplete data were available for these entities serving special education students and were therefore excluded from any analyses in this report.

5. These 100 largest districts in terms of public and private enrollment are: Antigo, Appleton Area, Ashland, Ashwaubenon, Baraboo, Beaver Dam, Beloit, Elmbrook, Burlington Area, Cedarburg, Chippewa Falls Area, Cudahy, De Forest Area, Kettle Moraine, Delavan-Darien, De Pere, Eau Claire Area, Elkhorn Area, Fond du Lac, Fort Atkinson, Franklin Public, Germantown, Grafton, Green Bay Area, Greendale, Greenfield, Hamilton, Holmen, Hortonville, Howard-Suamico, Hudson, Janesville, Kaukauna Area, Kenosha, Kimberly Area, La Crosse, Madison Metropolitan, Manitowoc, Marinette, Marshfield, Medford Area, Menasha, Menomonee Falls, Menomonie Area, Mequon-Thiensville, Merrill Area, Middleton-Cross Plains, Milton, Milwaukee, Monona Grove, Monroe, Mukwonago, Muskego-Norway, Neenah, New Berlin, New London, New Richmond, Oak Creek-Franklin, Oconomowoc Area, Onalaska, Oregon, Oshkosh Area, Plymouth, Portage Community, Port Washington-Saukville, Pulaski Community, Racine, Reedsburg, Rhinelander, Rice Lake Area, River Falls, D C Everest Area, Sauk Prairie, Seymour Community, Shawano-Gresham, Sheboygan Area, Shorewood, Slinger, South Milwaukee, Sparta Area, Stevens Point Area, Stoughton Area, Sun Prairie Area, Superior, Tomah Area, Two Rivers, Verona Area, Watertown, Waukesha, Waunakee Community, Waupaca, Waupun, Wausau, Wauwatosa, West Allis, West Bend, West De Pere, Whitefish Bay, Whitnall, Wisconsin Rapids.

6. Wis. Stat. § 115.76(15) (199-2000).

7. Wis. Stat. § 115.76(7). This language mirrors the federal definition:

> special education and related services that -- (A) have been provided at public expense, under public supervision and direction, and without charge; (B) meet the standards of the State educational agency; (C) include an appropriate preschool, elementary, or secondary school education in the State involved; and (D) are provided in conformity with the individualized education program required under section 614(d).

Pub. L. 91-230 § 602(8), 20 USCA§ 1401 (2000).

8. Pub. L. 94-142 (1975).

9. The IDEAis the primary law dealing with the education of disabled students. However, two other federal laws also apply to the education of disabled children, and impose legal requirements on school districts serving these students: (1) Section 504 of the Rehabilitation Act of 1973, which prohibits discrimination based on disability in programs or activities receiving federal financial assistance; and, to a much lesser extent, (2) Title II of the Americans with Disabilities Act of 1990, which prohibits discrimination against qualified individuals with disabilities in all programs, activities, and services provided by state and local governments. Many of the dictates of the IDEA, Section 504, and the ADAoverlap, but on occasion the force of the latter two statutes can have an important, independent effect on the requirements of educating children with disabilities.

10. Joetta L. Sack. "Schools Grapple with Reality of Ambitious Law," *Education Week*, Dec. 6, 2000.

11. The figure for 1992-93 is taken from Wisconsin Legislative Audit Bureau, "An Evaluation of Special Education Funding, 99-7, p. 14 [hereinafter, LAB Report].

12. Note that this number is less than the 125,358 figure cited earlier. The difference is due to the exclusion of children identified as in special education were are served in non-traditional settings, such as the Department of Corrections, Department of Health of Family Services, the Wisconsin School for the Deaf, and the Wisconsin Center for the Blind and Visually Impaired.

13. Letter from Janice Mueller, State Auditor, to State Senator Gary George and State Representative Carol Kelso, Co-chairpersons, Joint Legislative Audit Committee, May 3, 1999, available in LAB Report.

14. LAB Report, p. 45

15. Moreover, the 1999 Legislative Audit Bureau report competently and comprehensively discusses most of these matters.

16. These figures are from the DPI's Complete Annual School Cost (CASC) data, available at <http://www.dpi.state.wi.us/dpi/dfm/sfms/sectd.html>.

17. For a more complete explanation of the process by which students become eligible for special education, and the rights that attach to those students and parents of those students, *see* Jay Grenig. *Guide to Special Education Law in Wisconsin*. Marquette University Law School (1996) [hereinafter, Grenig].

18. By the term "school district," I am technically referring to what the state terms as Local Education Associations (LEAs). The Wisconsin Department of Public Instruction employs the LEA instead of "districts," yet these two terms are essentially the same and "school districts" are what conventionally demarcate local public school units.

19. Grenig, p. 11.

20. There are signs that the DPI is attempting to refocus districts in their special education identification process. Recently produced "technical assistance guides" that are meant to better enable district personnel in assessing and determining whether specific disabilities exist, contain language that at least on its face appears to emphasize caution in placement. For example, the "Specific Learning Disability Assessment and Decision Making: Technical Assistance Guide," contains numerous examples of language warning against over-identification, such as, by way of way of example, "delay or failure in general education, by itself, does not necessarily mean the student has [a specific learning disability] under IDEA." Wisconsin Department of Public Instruction. *Specific Learning Disability Assessment and Decision Making: Technical Assistance Guide*, Working Draft, August 27, 2001, p. 11.

21. Three districts had a 0% placement rate, with one of those (Wilmot) having no students initially referred in 2000-01, with the others (Union Grove and Waterford) having less than 10 students referred.

22. Grenig, p. 29.

23. *Id*. at 20-21.

24. *Id*. p. 6.

25. http://www.dpi.state.wi.us/dpi/dlsea/een/complain.html.

26. The Department of Public Instruction must investigate the complaint and issue a decision within 60 days of receiving the complaint. The department can take longer than 60 days if exceptional circumstances exist.

27. http://www.dpi.state.wi.us/dpi/dlsea/een/dueproc.html

28. Grenig, at 53.

29. Wis. Stat. §115.76(15) (1999-2000).

30. Wis. Stat. § 115.76(5)(a); 20 U.S.C. § 1401(3)(A)(2000).

31. Wis. Admin Code, Chapter Public Instruction, 11.37 (2001) [hereinafter PI]:

Study and report to the standing committees of the legislature. (1) The department shall conduct a study of the effect of the modification of special education eligibility criteria made under CHR 98-138 and report to the appropriate standing committees of the legislature under s. 13.172 (3), Stats., on the results of that study.

(2) A preliminary report on items specified under pars. (a) to (f) shall be submitted by June 30, 2003, and a final report on items specified under pars. (a) to (g) shall be submitted by June 20, 2005. The reports under this subsection shall include the following:

(a) A comparison of the incidence rates of children identified as children with a disability before and after implementation of CHR 98-138.

(b) If incidence rates have changed, an analysis of the relationship between referral rates and incidence rates before and after implementation of CHR 98-138.

(c) If incidence rates have increased, an analysis of the factors in CHR 98-138, and any other factors, which may have increased incidence rates.

(d) If incidence rates have increased, an analysis of the relationship between:

1. IEPteam determinations that a child is a child with a disability; and

2. IEPteam determinations that a child needs special education services and programming.

(e) A comparison of the number of review hearings, appeals, complaints filed with the department, mediation requests and lawsuits filed before and after implementation of CHR 98-138, and, if the numbers have increased, an analysis of the factors in CHR 98-138, and any other factors, which may have increased the numbers.

(f) An analysis regarding whether implementation of CHR 98-138 has increased either paperwork requirements by school district special education staff or special education monitoring activities of department staff, and if so, an analysis of the factors in CHR 98-138, and any other factors, which may have caused such increase.

(g) An analysis of pupil performance, for example on state assessment measures, and of factors relating to pupil performance for all children and for children with a disability, including a comparison of school districts with the highest rates of identifying pupils as children with a disability and those with the lowest rates of identifying pupils as children with a disability.

32. June 26, 20001, letter from John Benson to Richard Grobschmidt, Chair Senate Education Committee and Luther Olsen, Chair Assembly Education Committee.

33. LAB Report, p. 20.

34. *Id*.

35. Amy Hetzner. "Numbers, Needs Strain Special Education," *Milwaukee Journal Sentinel*, May 18, 2002.

36. *See* Wis. Stat. S. 115.791.

37. *See* http://www.dpi.state.wi.us/dpi/dlsea/een/cc_data.html.

38. National Research Council (2002), *Minority Students in Special and Gifted Education*. Committee on Minority Representation in Special Education. M. Suzanne Donovan and Christopher T. Cross, eds. Washington, DC: National Academy Press, p. 2-2 [hereinafter, NRC].

39. NRC, p. 2-3.

40. Chester E. Finn, Jr., Andrew J. Rotherham, & Charles R. Hokanson, Jr. (eds.), *Rethinking Special Education for a New Century*. Washington, DC: Thomas B. Fordham Foundation and Progressive Policy Research Institute, p. 259 [hereinafter, *Rethinking Special Education*].

41. NRC, p. 7-7.

42. PI 11.36(6)(a).

43. According to the Code, PI 11.36(6)(b):

(b) The IEPteam shall base its decision of whether a child has a specific learning disability on formal and informal assessment data on intellectual ability, academic achievement, and learning behavior from sources such as standardized tests, error analysis, criterion referenced measures, curriculum-based assessments, student work samples, interviews, observations, and an analysis of the child's response to previous interventions, classroom expectations, and curriculum in accordance with s. 115.782, Stats.

44. PI 11.36(6)(b)1.

45. PI 11.36(6)(b)2.

46. PI 11.36(6)(b)2.a-c.

47. PI 11.36(6)(b)3.

48. *Id*.

49. PI 11.36(6)(c)1-3.

50. PI 11.36(6)(d)

51. *Rethinking Special Education*, p. 259.

52. PI 11.36(6)(c)(1).

53. Wis. Stat. 115.782(3)(a) (1999-2000).

54. 20 U.S.C.A. § 1401(3)(A)(i) (2000); 34 C.F.R. § 300.7(a)(1).

55. PI 11.36(7)(a).

56. PI 11.36(7)(b).

57. According to Wis. Admin. Code PI 11.36(7)(c):

(c) The IEP team shall rely on a variety of sources of information, including systematic observations of the child in a variety of educational settings and shall have reviewed prior, documented interventions. If the IEP team knows the cause of the disability under this paragraph, the cause may be, but is not required to be, included in the IEP team's written evaluation summary.

58. PI 11.36(7)(d).

59. § 34 C.F.R. 300.7(4)(ii)(2000).

60. DPI. *Emotional Disability Evaluation Guide*. August 2001.

61. 34 C.F.R § 300.7 (c)(11).

62. Wis. Admin Code PI 11.36(5).

63. These studies include: the National Academy of Sciences report, *supra* note 15; *Rethinking Special Education, supra* note 17, Chapter 5; and a set of presently unpublished papers by the Harvard University Civil Rights Project. These papers were presented in conjunction with a November 2000 conference on Minority Issues in Special Education in Public Schools. The three papers are: Donald P. Oswald, et al. (2000), "Community and School Predictors of Over-Representation of Minority Children in Special Education"; David Osher, et al. (2000), "Exploring Relationships between Inappropriate and Ineffective Special Education Services for African American Children and Youth and their Overrepresentation in the Juvenile Justice System"; Tom Parrish (2000), "Disparities in the Identification, Funding, and Provision of Special Education.".

64. NRC, Appendix 2-A.

65. NRC p. 2-8 to 2-9.

66. *Rethinking Special Education.* Chapter 5; Matthew Ladner, "Separate But Unequal: Race and Special Education," *American Outlook*, Vol. V, No. 2 (Spring 2002), p. 13-14.

67. *Rethinking Special Education*, 13.

68. *Rethinking Special Education*, 108.

69. NRC, p. 2-16.

70. Special data runs, Department of Public Instruction, April 2002.

71. Nancy Fuhrman, Special Education Team, Wisconsin Department of Public Instruction, e-mail, May 8, 2002.

72. Figures derived from Table 4, *Section B: Statewide Statistical Summary Tables, Non-Fiscal, 2000-01* and Section C.

73. Based on totals from DPI *Special Education Reports*, 2001-02.

74. *Id*.

75. Nancy Fuhrman, Special Education Team, Wisconsin Department of Public Instruction, e-mail, May 8, 2002.

76. NRC, p. 2-7.

77. Furthermore, the private school enrollment collection is not a required report for private schools to make, although most do report enrollment to the DPI. Nancy Fuhrman, Special Education Team, Wisconsin Department of Public Instruction, e-mail, May 8, 2002

78. Nancy Fuhrman, Special Education Team, Wisconsin Department of Public Instruction, e-mail, May 8, 2002.

79. This calculus is essentially the same as described by the NRC in its report, p. 2-7.

80. *See Rethinking Special Education*, Chapter 5.

81. NRC, p. 2-21.

82. NRC, p. 2-21.

83. Citations made in these explanations have been omitted.

84. *Rethinking Special Education*, Chapter 12.

85. Jay P. Greene, "Blaming Special Education," *National Review*, May 23, 2002.

86. NRC, p. 1-3.

87. *Id*.

88. *See* Sack, *supra* note 10.

89. *See* 20 U.S.C § 1401(a)(17); 34 CFR 300.16(a); admin code PI 11.02(45).

90. Wisconsin School Performance Report, available at <http://www2.dpi.state.wi.us/wsas>.

91. http://www.dpi.state.wi.us/dpi/dlsea/een/hmperform.html.

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