



# **Segregated Schools and Shadow Campuses for Students with Disabilities in Texas**

*A Policy Brief for State Lawmakers*

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A Report By:

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for Texans with Disabilities

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# Introduction

Disability Rights Texas (DRTx) is a protection and advocacy agency (P&A) for people with disabilities in the state of Texas.<sup>i</sup> Our mission is to help people with disabilities understand and exercise their rights under the law, ensuring their full and equal participation in society. Within education, DRTx is concerned with ensuring that rights designated in the Individuals with Disabilities Education Act (IDEA) and in Texas state law are upheld in Texas schools. DRTx’s education team works to protect the rights and safety of students with disabilities in the form of advocacy and legal assistance.

## Context

### Overview of Special Education in Texas

According to the Public Education Information Management System (PEIMS) from the 2023-2024 school year, there were 774,489 students with disabilities receiving special education services.<sup>ii</sup> This is 14% of Texas’ total public school and public charter school students. Under IDEA, these students are entitled to a free and appropriate public education (FAPE) according to his/her/their needs.<sup>iii</sup>

The PEIMS data lists students’ type of primary disability in 13 main categories. As shown in the table below, the largest category is Learning Disabilities, which makes up 35.84% of all students with disabilities in the state. This is followed by Speech Impairment (17.70%), then Autism (16.16%).

### Students with Disabilities by Type of Primary Disability

Type of Primary Disability	Number of Students	Percent of Students
Learning Disability	277,558	35.84%
Speech Impairment	137,071	17.70%
Autism	125,189	16.16%
Other Health Impairment	93,057	12.02%
Intellectual Disability	71,164	9.19%
Emotional Disturbance	41,748	5.39%
Noncategorical Early Childhood	12,986	1.68%
Deaf and Hard of Hearing	7,198	0.93%
Visual Impairment	3,594	0.46%
Orthopedic Impairment	3,181	0.41%
Traumatic Brain Injury	1,250	0.16%
Deaf-Blind	480	0.06%
Developmental Delay	12	0.00%

Source: [PEIMS Special Education Report 2023-2024](#)

In accordance with 34 C.F.R. 300.115, local educational agencies (LEAs) must offer a continuum of alternative placements to deliver FAPE to all students with disabilities. If a student is unable to receive FAPE in a general education environment, steps are taken to place them in an environment more suitable for his/her/their needs. The placement should be the least restrictive environment (LRE) appropriate for the student, with a regular classroom setting being the least restrictive. For school-age students (excluding early childhood), in the 2022-2023 school year, the state of Texas reported child count data for the following eight educational environments:

1. Inside regular class 80% or more of the day (RC80)
2. Inside regular class no more than 79% of the day and no less than 40% of the day (RC79TO40)
3. Inside regular class less than 40% of the day (RC39)
4. Correctional Facilities (CF)
5. Homebound/Hospital (HH)
6. Parentally Placed in Private Schools
7. Residential Facility (RF)
8. Separate School (SS)

The definitions of these placements are defined in IDEA part B section 618: Child Count and Educational Environments.<sup>iv</sup> In Texas, the distribution of students with disabilities in these placements is as follows:

### Students with Disabilities by Type of Educational Environment

Educational Environment	Number of Students	Percent of Students
Inside regular class 80% or more of the day	490,761	73.54%
Inside regular class less than 40% of the day	90,021	13.49%
Inside regular class 40% through 79% of the day	80,419	12.05%
Homebound/Hospital	2,624	0.39%
Separate School	2,228	0.33%
Parentally Placed in Private Schools	710	0.11%
Correctional Facilities	466	0.07%
Residential Facility	69	0.01%

Source: [IDEA Section 618 Data Products: Static Tables Part B Child Count and Educational Environments Table 13](#)

Calculated from the preceding table, 176,537 students with disabilities in Texas (26.36%) receive more than 20% of their education outside of a “regular class” environment. Those students’ placements range in level of restrictiveness to meet the LRE mandate, as is individually determined by each student’s admission, review, and dismissal (ARD) committee.

## What Are the Policy Issues with Segregated School Campuses and Programs?

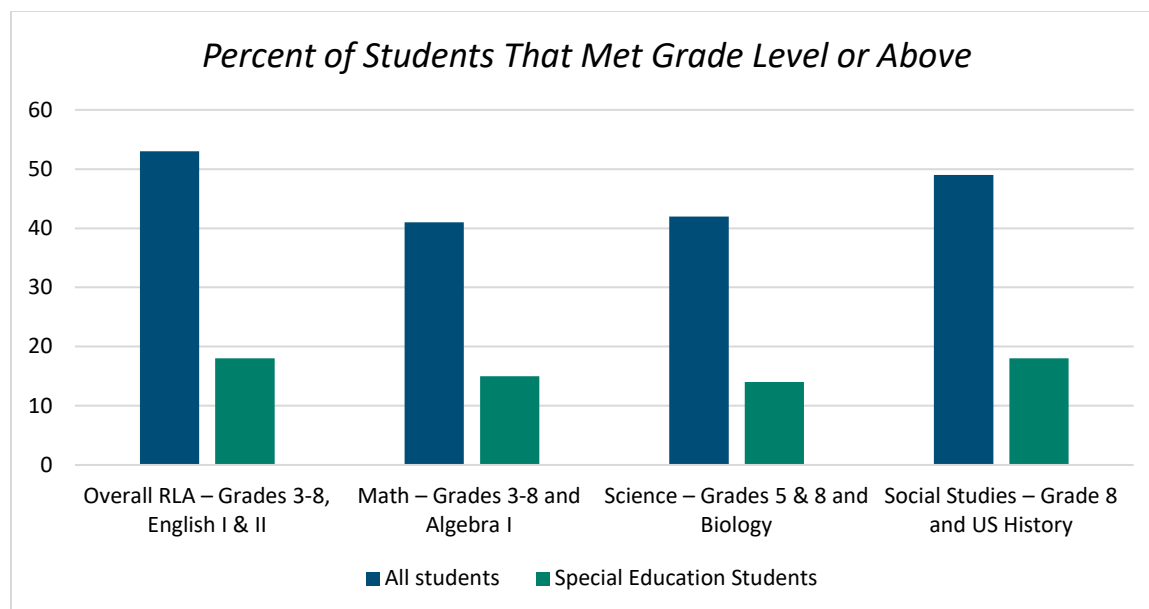
There are three main concerns regarding students with disabilities in Texas schools that led to the research that will be presented in this brief.

### 1. Overrepresentation of Students with Disabilities in Physical Restraints

In Texas, restricting student movement through physical restraint is legal in certain circumstances. Both the Texas Education Code (TEC) and the Texas Education Agency (TEA) regulations specify how students may be restrained in schools.<sup>v</sup> Many advocates have argued that the large number of restraints in Texas schools suggests an over-reliance on this method, even in situations where nonviolent de-escalation interventions should be prioritized.<sup>vi</sup> Students with disabilities have been grossly overrepresented in restraint instances. A DRTx report from 2020 found that over 90% of restraints involved a student with disabilities, despite only representing 9.8% of total students in that year.<sup>vii</sup> This is concerning because physically restraining students can create unsafe learning environments, injury, and even death.<sup>viii</sup> The disproportionate representation of students with disabilities in these instances suggests a reframing of how disability is treated in education. This issue is a leading concern of this brief.

### 2. Low Student Outcomes in State Testing and Transitional Planning

Second, student academic performance in the State of Texas Assessments of Academic Readiness (STAAR) testing and student readiness for adulthood is a concern of DRTx.<sup>ix</sup> According to the 2024 STAAR results, students with disabilities perform drastically lower than the state average in all subjects. Notably, only 18% of students with disabilities met grade-level standards in Reading Language Arts (RLA) for grades 3-8 English I and II, as opposed to 53% of the general population.<sup>x</sup> The other results from STAAR testing have similar disparities, as seen on the chart below.



Source: [2023-2024 STAAR All Results Analysis](#)

In addition to STAAR test results, there is cause for concern in special education student outcomes as they reach graduation. In Texas, students with disabilities that do not have a regular diploma can continue to receive special educational services in public schools through age 21.<sup>xi</sup> This allows students the time to prepare for a life of independent living beyond high school. At age 14, students receiving special education services must have a transition plan written into their Individual Education Plan (IEP) to assist in the shift towards adulthood. Despite the transition planning requirements in the TEC, results from 2021-2022 showed that only 27.4% of students with disabilities graduated with a completed IEP and career readiness.<sup>xii</sup> Further, only 13.6% of students in special education showed college readiness as opposed to 52.9% of Texas graduates in 2022.<sup>xiii</sup> This data suggests that the current transitional plans for students with disabilities are in need of improved implementation, if not reform.

### **3. Lack of Inclusive Placements for Students Identified as High-Need**

Lastly, DRTx has concerns that the students whom districts identify as high-need are too often put in highly-restrictive environments. While LEAs must provide a continuum of alternative educational placements to accommodate students, these placements should be the least restrictive environment appropriate for the student's needs. Through the information presented in this brief, DRTx will argue that students with severe disabilities, especially students with autism and added behavioral challenges, are sometimes placed in restrictive environments without the possibility to return to an inclusive placement. The placement of students based on type of disability raises concerns about adherence to least restrictive environment rule in 34 C.F.R. 300.114.<sup>xiv</sup> Further, the number of students outside general education environments suggests the necessity for policy change which allows all schools to better accommodate students with disabilities in inclusive environments.

### **Segregated Schools and Shadow Campuses: What are They?**

In the state of Texas, there are 1,207 school districts and charters that contain almost 9,000 officially recognized campuses. Of these campuses, there are 51 in which at least half of their students have disabilities.<sup>xv</sup> With special attention to the three main concerns listed above, this brief will first address the 22 campuses in which more than 90% of their enrolled students have disabilities and were receiving special education services in 2022-2023. The students at these schools are receiving all of their educational services in segregated environments and do not learn, or socialize, with non-disabled peers. While this is a very small number of schools in the state of Texas, analyzing these highly restrictive environments helps to reveal how students with complicated disabilities and behavioral challenges are often cast aside without a way to ensure that they are succeeding in the environment that is appropriate for their needs. DRTx will refer to these 22 schools with populations of more than 90% special education students as **“segregated schools.”**

These segregated schools satisfy the criteria set forth in the Texas Educational Data Standards (TEDS) for an instructional campus.<sup>xvi</sup> The criteria for an instructional campus under TEDS are:

1) has an assigned administrator, 2) has enrolled students who are counted for average daily attendance, 3) has assigned instructional staff, 4) receives federal and/or state and/or local funds as its primary support, 5) provides instruction in the Texas Essential Knowledge and Skills (TEKS), 6) has one or more grade groups in the range from early education through grade 12, and 7) is not a program for students enrolled in another public school.<sup>xvii</sup>

When a location satisfies these criteria, TEA assigns a campus ID number. This campus ID is significant for a number of reasons, including reporting requirements and state monitoring. For example, official campuses are required to release data on student enrollment and demographics, student discipline, finances, staff demographics, student outcomes, and more. This data submission is integral to monitoring of schools in Texas, and especially for flagging data discrepancies for intervention. Curiously, the TEDS also distinguishes a category of campuses that it calls “alternative instructional units,” which can look very much like instructional campuses. The criteria for the alternative instructional units are as follows:

1) is an instructional site, center, program, or arrangement that is not governed by an individual campus organization, and 2) does not meet the above standard definition of an instructional campus.<sup>xviii</sup>

At DRTx, we believe these definitions of campuses and alternative instructional units are arbitrary. Our worry is that effectively there is a loophole which permits a campus to exist without official recognition by TEA. Even though alternative instructional units are not officially regarded as instructional campuses, they often have their own buildings, administrators, teachers, they take attendance, they receive funding from the district or home campus and provide TEKS instruction to K-12 students. They are frequently called “special programs” on district websites, rather than schools. The only reasoning available that these alternative instructional units or “special programs” are not considered instructional campuses is that their students remain officially enrolled at a home-campus in the district. The criteria seemingly allow campuses that self-identify as “instructional sites, centers, programs, or arrangements” to exist without monitoring or data submission requirements because of an administrative loophole.

Any data from alternative instructional units gets diluted into the home-campus’ data submission to TEA, likely ridding it of any discrepancies. This is concerning to DRTx because alternative instructional sites are often self-contained segregated environments for students with disabilities that also struggle with behavioral challenges that educators might find difficult

to address on a general education campus. Further, even though these programs are located at entirely separate school facilities, they are not treated as campuses under the TEDS standards. For the purposes of this brief, DRTx will refer to these as **“Shadow Campuses.”**

In our investigation, we have discovered that both segregated schools and shadow campuses necessitate policy reform in order to ensure student safety and success. Further, the lack of information about shadow campuses is cause for immediate action to change their status to instructional campuses to permit state monitoring to ensure student wellness and success.

## **Discussion: Segregated Schools**

Each local education agency (LEA) in Texas is responsible for providing services to accommodate students with disabilities, including a continuum of alternative placements for students who require additional services outside of general education environments. As a response to this responsibility, several districts have opened public schools specifically intended for students with disabilities. These schools are for students of high-need who were removed from their home-campus and were placed at their new segregated school. There are 51 public schools in Texas in which at least half of their students have disabilities. This section will specifically address the 22 most-segregated schools in which more than 90% of their enrolled students have disabilities and are receiving special education services. According to the most recent Texas Academic Performance Report (TAPR) from 2022-2023 the 22 schools are:

- Adult Transition Services, Eanes ISD
- Angleton Campus, Trinity Charter Schools
- Bendwood School, Spring Branch ISD
- Boulevard Heights, Fort Worth ISD
- Burleson Center, Edgewood ISD
- Developmental Center, Mexia ISD
- Foundation School of Autism - Plano, Premier High Schools
- Foundation School of Autism - San Antonio, Premier High Schools
- Greenleaf Neurodiversity Community Center, Austin ISD
- Holmgreen Center, Northside ISD
- Houston Community College Life Skills, Houston ISD
- Jo Kelly Special Education, Fort Worth ISD
- Lane School, Aldine ISD
- Legacy Learning Center, Northwest ISD
- Marie Huie Special Education Center, Carrollton-Farmers Branch ISD
- Pathfinder Camp, University of Texas University Charter Schools

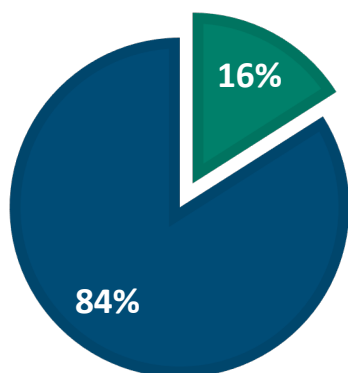


- Reddix Center, Northside ISD
- Rosedale, Austin ISD
- Special Education Co-Op, Crosbyton CISD
- Texas NeuroRehab Center, University of Texas University Charter School
- Transition Center, Fort Worth ISD
- Whispering Hills Achievement Center, Flatonia ISD

In the 2022-2023 school year, there were a total of 1,069 students enrolled at these schools, from early-childhood to 12<sup>th</sup> grade. The majority of these students are male, almost 70%. Of the 1,069, almost 37% of the students have autism as their primary disability.<sup>xix</sup> In the state of Texas, autism makes up only 15.5% of all primary disabilities. The implication of the disproportionate representation of students with autism in highly restrictive environments is that their home campuses did not have the resources or trained personnel to deliver FAPE to these students. This disproportionality begs the question: rather than move students with autism to segregated schools, what is being done to increase a general education environment’s ability to accommodate a range of disabilities and needs?

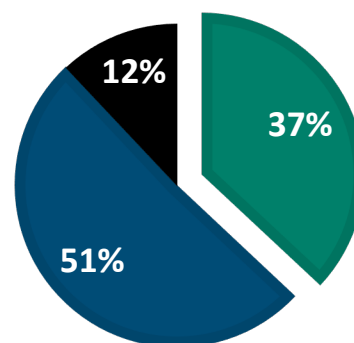
**TYPE OF DISABILITY:  
ALL TEXAS PUBLIC  
SCHOOLS**

- Autism
- All Other Disabilities



**TYPE OF DISABILITY:  
SEGREGATED SCHOOLS**

- Autism
- Other Disabilities
- Unknown



Source: [2022-2023 Texas Academic Performance Reports](#)

Of the 1,069 students, about 66% were in 12<sup>th</sup> grade in the 2022-2023 school year, indicating that some of the schools serve as transition programs for students who are 18-21 years old. In Texas, students who have not received a regular diploma are able to receive special education services until they turn 22, which is important for the demographic of high-need students. These schools, then, have the responsibility of preparing students for life beyond high school, and ideally for independent living. At present, there is no state law or policy that requires

segregated schools to have extra transitional planning, aid, and services for students who are 18 years old and older.

Segregated schools may be pitched to administrators and student guardians as the best fit for those who have had significant behavioral difficulties in general education environments. Many segregated schools have smaller staff-to-student ratios compared to regular schools, which can make them better equipped for some student needs. However, general uncertainty of the porousness between segregated schools and general education environments makes it difficult to be sure if they are helpful or harmful. The TEC does not impose guidance necessitating how a student should return to a general education campus from segregated schools. Thus, there is not a concrete way to ensure that the students are receiving their education in the LRE appropriate for their academic and non-academic needs. This lack of specification and monitoring calls into question segregated schools' adherence to IDEA, and further, the treatment and safety of the vulnerable populations that they enroll.

### **Segregated School Profile: Boulevard Heights**

The Boulevard Heights School is an alternative school for students with disabilities in Fort Worth ISD, and is one of the 22 segregated schools that DRTx is studying for this issue brief. In the 2020-2021 school year, Boulevard Heights had 55 students, all of whom were receiving special education services. Of the 55, 19 were in 12<sup>th</sup> grade and the rest were scattered among all other grades, starting in kindergarten.<sup>xx</sup> The majority of the students had autism, which remains true of the most recent TAPR as well.<sup>xxi</sup> On the school website, Boulevard Heights self-describes as follows:

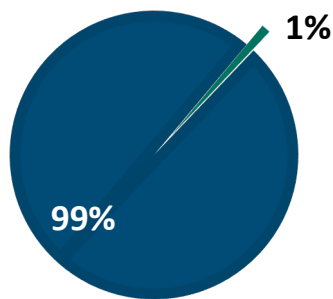
...The Boulevard Heights School, which serves approximately 50 students at any given time. As one of the oldest buildings on The Boulevard, it has continuously transformed over the years to meet the growing needs of the Fort Worth community. The students are aged 3-22 & have intellectual disabilities and/or severe behavior problems. Due to their disabilities or problems, the students face difficulty being successful on a general campus. However, The Boulevard Heights School provides a place for the students to thrive.<sup>xxii</sup>

Despite purporting itself as a place for students to thrive, there are several indicators that cause DRTx to be concerned about the safety and quality of education that students receive at this school. The Civil Rights Data Collection (CRDC) reported data from the 2020-2021 school year that revealed that Boulevard Heights relied heavily on physical restraint for their high-need population.<sup>xxiii</sup> In Fort Worth ISD, the CRDC reported that 47 students with disabilities were physically restrained in the school year, and 18 of those students were restrained at Boulevard Heights.<sup>xxiv</sup> Despite only enrolling 0.65% of Fort Worth ISD's special education students, Boulevard Heights was responsible for 38% of the students with disabilities that were restrained in 2020-2021. This huge overrepresentation likely reflects a lack of de-escalation

training and an inability to accommodate students with disabilities at a facility purportedly designed for their success.

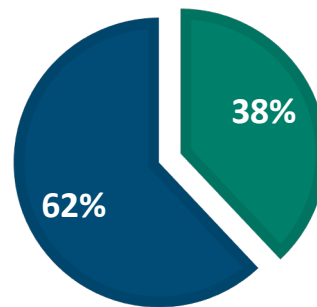
### FORT WORTH ISD STUDENTS WITH DISABILITIES (2020-2021)

- Boulevard Heights
- All Other FWISD Schools



### FORT WORTH ISD STUDENTS WITH DISABILITIES PHYSICALLY RESTRAINED (2020-2021)

- Boulevard Heights
- All Other FWISD Schools



Source: [2021 U.S. Department of Education Civil Rights Data Collection](#)

Of the 18 restrained students, one was 21-year-old Xavier Hernandez. Xavier had autism and schizophrenia, and was enrolled at Boulevard Heights during his last year of receiving special education services. His family assumed that he was safe at school with staff who were well equipped to work with his behaviors. However, Xavier’s family received a call on March 1, 2021 saying that there had been an incident at school and Xavier was in the hospital. He passed away later that day in his hospital bed. Subsequently, the Tarrant County Medical Examiner’s Office ruled that Xavier’s death was a result of the combined effects of an antipsychotic medication and a physical restraint that occurred that morning at Boulevard Heights.<sup>xxv</sup>

Ultimately, it came to light that the staff members who restrained Xavier had used a face-down restraint that was unapproved by the district because it can restrict airflow.<sup>xxvi</sup> This type of restraint is called a prone restraint. Though not illegal, prone restraints are against best practice because of the significant harm it can cause to the student. Despite this, in an interview with the *Fort Worth Star-Telegram*, a former staff member said that these types of restraints were common practice at Boulevard Heights.<sup>xxvii</sup> This was further confirmed just a few months later, when a Facebook video circulated of several teachers physically restraining a fourth grader outside the school. One staff member appears to be sitting on top of the student. Thankfully, the fourth grader was unharmed.

It appeared that Boulevard Heights had a school culture that normalized using physical restraint to subdue students with disabilities. The overuse of physical restraint, especially prone and supine restraints, necessitates a serious change in staff training. Further, it necessitates rethinking how students with disabilities should be treated in our schools, especially in

segregated environments. Since these two incidents in 2021, Fort Worth ISD unified its restraint training and provided training that focused more on de-escalation. DRTx believes that this is a positive direction for the district, and one that all schools should move toward to minimize harm. Current data is not yet available, but DRTx is hopeful that it will show a reduction in the number of restraints at Boulevard Heights and Fort Worth ISD in general.

Beyond safety, DRTx has concerns about segregated school environments for student outcomes. STAAR results and graduation rates are unavailable on Boulevard Heights' TAPR report due to small numbers. In the 2021-2022 school year, there was only one graduate despite there being 14 students in the 12<sup>th</sup> grade. In 2022-2023, four out of the 10 12<sup>th</sup> graders graduated. This begs the question of the transitional elements that Boulevard Heights, and other segregated schools, provide for their students who are 18 and older. Further, it begs the question of what similar schools are doing to support young adults with autism to be successful in educational systems and independent in adult life.

Lastly there is no indication available for how a student at Boulevard Heights returns to their home campus or a general education environment. On its website, Boulevard Heights does mention that the goal is for students to be successful in the LRE. While that is commendable, there is no indication of how that goal is tracked or monitored for individual students. Thus, there is a need for more structured analysis of returning students to their home-campus and less restrictive placements.

## **Discussion: Shadow Campuses**

Some LEAs have also created other programs on their continuum of alternative placements for special education students. Within the continuum are what DRTx calls “shadow campuses.” Shadow campuses are kinds of district programs with their own buildings, created exclusively for students with disabilities. While shadow campuses look and function like an officially recognized campus, districts get around designating them as an officially recognized campus because the students at the shadow campus remain enrolled at another school within the district. Districts utilize shadow campuses for students with the most complicated disabilities and behavioral challenges. Thus, the environments at shadow campuses are segregated and highly restrictive. The student populations that attend shadow campuses are arguably in need of the most intervention and monitoring from the state. However, they receive no state supervision or monitoring because of the loophole in the TEDS definition of an instructional campus.

While most self-contained programs function as separate classrooms within general education campuses, DRTx has observed that there are widely varying degrees of separation for self-contained programs. Sometimes a program for special education students functions like a campus within a campus. Such is the case with the Wayne D. Boshears Center for Exceptional Programs of Tyler ISD, which services K-12 students “who have been identified as having a severe/profound disability.”<sup>xxviii</sup> While Boshears is a self-contained program, it is located at the same address as Jones Elementary School of Tyler ISD. In 2022-2023, Boshears had 69 students and 48 staff members. Despite the significant number of people associated with the program,

Boshears does not have a campus ID and all students that attend are officially enrolled at different schools throughout the district.

More separate self-contained programs sometimes share buildings with other alternative educational programming for their district. One of these is called the Judson Achievement Center (JAC) in Judson ISD. The JAC is housed at 102 School Street, Converse, Texas 78109, in the same location as the Judson ISD Disciplinary Alternative Educational Program and the Judson Care Academy (an alternative learning environment for students with behavioral problems). The JAC self-describes as:

an alternative intervention program for students in all grade levels who have severe behavioral and/or emotional difficulties that require a highly structured therapeutic learning environment that cannot be provided on a regular campus. This program offers an option for students leaving residential or day hospital settings and transitioning into the public school system. JAC may also be appropriate for students who have difficulty functioning on a general campus, even in a self-contained setting.<sup>xxix</sup>

DRTx has monitored the JAC in the past and can confirm that the program described above is located at 102 School Street. However, an attempt to acquire information from Judson ISD through public information requests about the program was unsuccessful. In our correspondence, Judson ISD did not acknowledge the program's existence, despite the description being on the [district's website](#), and would not provide the number of students at the JAC. The lack of transparency raises red flags. The students at the JAC are enrolled at either the Judson Care Academy, or a different campus in the district. Thus, the profile of students in the JAC gets diluted among other schools.

DRTx is most concerned with programs that are located entirely in their own building, distinct from any other district educational programming, which we call shadow campuses. These shadow campuses seem to function entirely as instructional campuses with their own administrators, teachers, schedules, and dress codes. Students at these shadow campuses do not step foot on their home campuses—they receive their entire instruction at the shadow campus alongside other students with disabilities. Despite shadow campuses seemingly being the same as officially recognized instructional campuses, they are not subject to data collection and monitoring due to the loophole in the TEDS definition of an instructional campus. Despite them being in the shadows and hard to detect, DRTx has been able to identify some of them from working with students and families. Others have been identified through searching on district websites under “special programs” with distinct addresses. However, the total number of shadow campuses in Texas, and by extension the number of students they serve, is unknown. A few shadow campuses that we know of are: the REACH program of Lubbock ISD, the Therapeutic & Readiness Center of Klein ISD, and the GOALS Learning Center of Round Rock ISD.

## Shadow Campus Profile: GOALS Learning Center

The GOALS (Growth/Opportunity/Attitude/Learning/Success) Learning Center provides a highly restrictive educational environment for students from grades six to 12. The shadow campus is seemingly identical to an officially recognized campus: it has its own principal, assistant principal, administrative associate, teachers, and behavioral technicians. However, it is not listed as a school on the Round Rock ISD website, and it does not report campus-level student data to TEA. Because of this, any student data gets reported within their home-campus report, which dilutes any disproportionality or discrepancies that may have occurred among students who attended the program.

According to their website, GOALS is:

...designed for special education students with moderate to proficient [sic] communication skills who have significant behavior challenges resulting from an impactful disability. The students must also demonstrate a need for a more structured environment than is available on the home campus.<sup>xxx</sup>

The students that attend GOALS were placed at the school based on ARD committee meetings at their home campus. These students presumably were not showing success at their home campus due to their behavioral challenges, so they were moved to the highly-restrictive environment provided at GOALS. The website states that “the ultimate goal for each student is to successfully transition back to a general education campus.” It does not, however, detail how the transition back to their home campus is measured.

Like other segregated environments for students with disabilities, GOALS too has been known to use forms of physical restraint to subdue students. In one instance in 2022, an administrator at the shadow campus violently grabbed and pushed a student against a wall before using a prone restraint on him.<sup>xxxi</sup> This incident occurred in a “cool-off room,” where the student was meant to calm down after being overwhelmed. The student went home that day with a bump on his head and GOALS said that he had fallen. Eventually, the student’s family was able to acquire video proof of the incident.

The situation at GOALS came to light because the student’s mother sought legal counsel and ceaselessly advocated for her child. However, there are likely many similar situations at shadow campuses that are not as publicized. This incident exemplifies the need for increased state monitoring in segregated environments. Further, Texas data indicates clearly that students in special education are far more likely to be physically restrained in the classroom, yet shadow campuses that are specifically for this demographic of students are overlooked by the state.

When writing this brief, DRTx submitted open records requests in attempt to learn more about GOALS. Specifically, we requested basic information such as how many students participate in the program, what kind of primary disability the students have, how many staff members there are, etcetera. To the request, Round Rock ISD responded:

There is no student data reporting specific for GOALS. All GOALS students remain enrolled at their home campus so all data is reported by the home campus with no distinction to GOALS. As there is no responsive information regarding your request cited below, we will close this file.<sup>xxxii</sup>

Round Rock ISD's response exemplifies the crux of the issue with shadow campuses. Despite GOALS' intention of helping vulnerable populations of students who struggle on general education campuses, they do not follow the processes of data collection and monitoring that the state has in place to protect students. Any data that may show disproportionality or discrepancies associated with GOALS are filtered out through home campus reports, making it impossible to flag GOALS as a common denominator. Shadow campuses like GOALS are in urgent need of policy intervention for the wellbeing of the students that attend. Further, shadow campuses urgently need to be held to the same standard as officially recognized campuses.

## **Findings**

DRTx finds that shadow campuses and segregated schools house students with complicated disabilities and behavioral challenges without a clear path back to a general education campus. Restrictive placements for students with autism are especially overrepresented, causing them to be in highly-restrictive environments that may not meet their academic and social-emotional needs. Through our research, we believe that staff members in general education environments frequently do not have the appropriate training and resources to educate students with complicated disabilities and behavioral challenges. Consequently, students are sent to segregated environments where they may not be receiving FAPE in the least restrictive environment appropriate for their needs. This is reflected in low standardized test scores and graduation rates in segregated environments, as well as a lack of measurable criteria for students to return to general education environments.

Further, we find that the state of Texas has a problem with over-relying on physical means to subdue students with disabilities rather than using de-escalation and non-physical intervention methods. While this problem exists in general education environments, it becomes especially severe in highly-restrictive and segregated environments. Shadow campuses and segregated schools require the most in-depth training, yet staff members seemingly do not have the necessary level of training to ensure the safety of students.

Lastly, DRTx finds that there is a need for urgency in starting monitoring and data collection at shadow campuses, as they have been flying under the radar of the state. We are concerned that this is in part due to the loose definition of an instructional campus in the TEDS. Further, TEA seemingly gives LEAs the ability to designate shadow campuses as “alternative instructional units” instead of “instructional campuses” without any oversight. The lack of available data about shadow campuses dilutes any possibility for data disproportionality or discrepancies that would flag the environments for investigation or intervention.

## **Policy Recommendations**

### **Local Responsibilities**

At a local level, responsibilities lie in ensuring student safety, updating and upholding student IEPs with fidelity, supporting student academic success, and setting students up for successful transitions into adulthood. In line with these responsibilities, DRTx makes the following policy recommendations:

1. The creation of an IEP supplement for students in segregated settings to include individualized, measurable goals for returning to a general education environment
2. Mandatory ARD committee reviews each semester evaluating the student’s continued placement at a segregated setting with:
  - a. A requirement for academic growth
  - b. A requirement for social-emotional and behavioral growth
3. The creation of an IEP transition supplement for students 18 and older in separate settings with special attention to independent living, addressing concerns such as:
  - a. housing, transportation, college and career readiness, competitive integrated employment, etc.
4. Mandatory preventative de-escalation training for all staff
  - a. For home campus (once per year)
  - b. For segregated setting (once per semester)
5. Mandatory evidence-based training for teaching students with autism for all staff
  - a. For home campus (once per year)
  - b. For segregated setting (once per semester)



## TEA Responsibilities

At a state level, responsibilities lie in supervision, monitoring, and data collection. TEA is responsible for ensuring that LEAs are following processes that were created for the well-being of students. In line with these responsibilities, DRTx makes the following policy recommendations:

1. Registration of shadow campuses as instructional campuses
  - a. Revision of the TEDS definition of an instructional campus to close the loophole that allows for shadow campuses
  - b. TEA oversight of LEAs to ensure that they are registering segregated settings for students with disabilities as instructional campuses
2. Revision of the TEA special education External Desk Review Rubric to include specific monitoring of segregated campuses and shadow campuses:
  - a. If the student was removed from his/her home campus and placed in a special program or separate campus, does his/her IEP set individualized, measurable goals for returning to a general education environment?
  - b. Was an ARD meeting held each semester to evaluate the student's continued placement in a separate setting?
  - c. Does the separate setting meet the LRE requirement based on the student's academic and non-academic needs?
3. Incorporation into TEA Targeted Interventions Monitoring with an analytics approach to identify patterns of data discrepancies in segregated settings that require the state's attention

## Conclusion

While shadow campuses and segregated schools represent a small number of instructional locations in the state of Texas, the students that attend are some of the most vulnerable and deserving of attention from policymakers. Our investigation revealed that these settings have students that are overwhelmingly male, have autism, and are close to aging out of their rights to special education. We have found that once these students are in segregated settings, they are not likely to ever leave. The students in segregated environments are especially vulnerable because they are subject to excessive restraints and their educational outcomes are generally poor. Despite necessitating extra attention, our investigation revealed that much of the data on this student population is inaccessible—scattered throughout various schools in the district and rid of any disproportionality or discrepancies. Additionally, shadow campuses that are intended for vulnerable populations are flying under TEA’s radar due to an administrative loophole. Thus, the settings and students that are most in need of state oversight are receiving none. DRTx will continue to devote attention to this issue and work with policymakers to increase state oversight, improve safety, and raise student outcomes.

# Appendix

**Table: Percent of Students That Met Grade Level or Above**

The table below contains the same information as the bar graph on page 5.

Test	All Students	Special Education Students
Overall RLA – Grades 3-8, English I & II	53%	18%
Math – Grades 3-8 and Algebra I	41%	15%
Science – Grades 5 & 8 and Biology	42%	14%
Social Studies – Grade 8 and US History	49%	18%

Source: [2023-2024 STAAR All Results Analysis](#)

## Acknowledgements

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## More Information

For more information, please contact: Disability Rights Texas, [www.DRTx.org](http://www.DRTx.org), 512-454-4816.

## Endnotes

<sup>i</sup> To learn more about DRTx's role as a P&A, see: [What do P&As Do?](#)

<sup>ii</sup> TEA, PEIMS Standard Report, 2023-2024 Special Education Report, [https://rptsvr1.tea.texas.gov/cgi/sas/broker?\\_service=marykay&\\_program=adhoc.std\\_driver1.sas&RptClass=SpecEd&\\_debug=0&SchoolYr=24&report=StateState&format=html](https://rptsvr1.tea.texas.gov/cgi/sas/broker?_service=marykay&_program=adhoc.std_driver1.sas&RptClass=SpecEd&_debug=0&SchoolYr=24&report=StateState&format=html).

<sup>iii</sup> To learn more about a student's right to FAPE, see IDEA Manual:

<https://disabilityrightstx.org/en/publication/idea-manual/>.

<sup>iv</sup> U.S. Dep't of Educ., IDEA Section 618 Data Products Static Tables, Part B Child Count and Educational Environments, Table 13 Number and percent of students age 5 (Kindergarten) through 21 served under IDEA part B, by educational environment and state. 2022-2023, <https://data.ed.gov/dataset/idea-section-618-state-part-b-child-count-and-educational-environments/resources>.

<sup>v</sup> 19 Tex. Admin. Code 89.1053: Procedures for Use of Restraint and Time-Out,

[https://texreg.sos.state.tx.us/public/readtac\\$ext.TacPage?sl=R&app=9&p\\_dir=&p\\_rloc=&p\\_tloc=&p\\_ploc=&pg=1&p\\_tac=&ti=19&pt=2&ch=89&rl=1053](https://texreg.sos.state.tx.us/public/readtac$ext.TacPage?sl=R&app=9&p_dir=&p_rloc=&p_tloc=&p_ploc=&pg=1&p_tac=&ti=19&pt=2&ch=89&rl=1053).

<sup>vi</sup> Disability Rights Texas, Addressing Harmful Restraint of Texas Students (2023),

<https://disabilityrightstx.org/wp-content/uploads/2023/01/Addressing-Violent-Restraint-of-Texas-Students.pdf>; Restraining Students Should Be Limited in Texas Schools to Prevent Abuse, Advocates Urge, *The Dallas Morning News* (2023),

<https://www.dallasnews.com/news/education/2023/01/30/restraining-students-should-be-limited-in-texas-schools-to-prevent-abuse-advocates-urge/>.

<sup>vii</sup> Disability Rights Texas, Harmful Restraint of Students with Disabilities in Texas Schools: An Investigative Report from Disability Rights Texas (2020), <https://disabilityrightstx.org/wp-content/uploads/2021/01/DRTx-Restraint-Report-FINAL-Dec-7-2020-2.pdf>.

<sup>viii</sup> Congressional Hearing Report, Examining the Abusive and Deadly Use of Seclusion and Restraint in School: Hearing Before the Committee of Education and Labor, 111<sup>th</sup> Cong. (2009), [CHRG-111hrg49597.pdf \(govinfo.gov\)](https://www.govinfo.gov/app/details/CHRG-111/hr49597/pdf).

<sup>ix</sup> While STAAR is subject to many critiques, it is nonetheless the most available standardized measure of academic achievement to judge how students with disabilities are learning in Texas schools.

<sup>x</sup> TEA, 2024 STAAR Results, <https://tea.texas.gov/student-assessment/staar-all-results-analysis-2023-2024.pdf>.

<sup>xi</sup> See: [34 C.F.R. 300.102\(a\)\(3\)](#) and [19 Tex. Admin. Code 89.1035\(a\)](#).

<sup>xii</sup> TEA, TAPR, 2022-2023,

[https://rptsvr1.tea.texas.gov/cgi/sas/broker?\\_service=marykay&\\_program=perfreport.perfmast.sas&\\_debug=0&ccyy=2023&lev=S&prgopt=reports%2Ftapr%2Fpaper\\_tapr.sas](https://rptsvr1.tea.texas.gov/cgi/sas/broker?_service=marykay&_program=perfreport.perfmast.sas&_debug=0&ccyy=2023&lev=S&prgopt=reports%2Ftapr%2Fpaper_tapr.sas).

<sup>xiii</sup> Criteria for Career Readiness is found in the TAPR glossary:

<https://rptsvr1.tea.texas.gov/perfreport/tapr/2023/glossary.pdf>.

<sup>xiv</sup> Further, these restrictive placements also raise questions about compliance with 28 C.F.R. 35.130.

<sup>xv</sup> For the purposes of this issue brief, we are not addressing or analyzing special schools for students that have a visual impairment, deafness, or hard of hearing.

<sup>xvi</sup> TEDS are the data standards used for the Texas Student Data System. The Texas Student Data System is the statewide system for collecting and reporting student data for public schools. To learn more, see: <https://www.texasstudentdatasystem.org/>.

- <sup>xvii</sup> TEDS contains the definition of an instructional campus. To learn more, see: <https://tealprod.tea.state.tx.us/TWEDS/103/0/0/0/DataComponents/DataElements/List/19979>.
- <sup>xviii</sup> Ibid.
- <sup>xix</sup> The actual representation of autism is likely higher, as TAPR hides data of small populations to protect student privacy. Because of data masking to protect the identity of individual students, the type of disability for 12% of this population is unknown.
- <sup>xx</sup> TEA, TAPR Boulevard Heights, 2020-2021, [https://rptsvr1.tea.texas.gov/cgi/sas/broker?\\_service=marykay&\\_program=perfreet.perfmast.sas&\\_debug=0&ccyy=2021&lev=C&id=220905104&prgopt=reports%2Ftapr%2Fpaper\\_tapr.sas](https://rptsvr1.tea.texas.gov/cgi/sas/broker?_service=marykay&_program=perfreet.perfmast.sas&_debug=0&ccyy=2021&lev=C&id=220905104&prgopt=reports%2Ftapr%2Fpaper_tapr.sas).
- <sup>xxi</sup> TEA, TAPR Boulevard Heights, 2022-2023, [https://rptsvr1.tea.texas.gov/cgi/sas/broker?\\_service=marykay&\\_program=perfreet.perfmast.sas&\\_debug=0&ccyy=2023&lev=C&id=220905104&prgopt=reports%2Ftapr%2Fpaper\\_tapr.sas](https://rptsvr1.tea.texas.gov/cgi/sas/broker?_service=marykay&_program=perfreet.perfmast.sas&_debug=0&ccyy=2023&lev=C&id=220905104&prgopt=reports%2Ftapr%2Fpaper_tapr.sas).
- <sup>xxii</sup> See Boulevard Heights Website: <https://tx01918778.schoolwires.net/domain/938>.
- <sup>xxiii</sup> The CRDC is a federal data set on public schools across the nation.
- <sup>xxiv</sup> U.S. Dep't of Educ., CRDC Report, Boulevard Heights 2020-2021 [https://civilrightsdata.ed.gov/profile/us/tx/fort\\_worth\\_isd/boulevard\\_heights?surveyYear=2020&nces=481970001832](https://civilrightsdata.ed.gov/profile/us/tx/fort_worth_isd/boulevard_heights?surveyYear=2020&nces=481970001832); U.S. Dep't of Educ., CRDC report, Fort Worth ISD 2020-2021, [https://civilrightsdata.ed.gov/profile/us/tx/fort\\_worth\\_isd?surveyYear=2020&nces=4819700](https://civilrightsdata.ed.gov/profile/us/tx/fort_worth_isd?surveyYear=2020&nces=4819700).
- <sup>xxv</sup> Silas Allen, 2022, Fort Worth teachers used illegal restraint before student's death, police report shows, *Fort Worth Star Telegram*, <https://www.star-telegram.com/news/local/education/article268519762.html>.
- <sup>xxvi</sup> Ibid.
- <sup>xxvii</sup> Ibid.
- <sup>xxviii</sup> See Boshears Website: <https://www.tylerisd.org/o/wdbcep/page/about-us>.
- <sup>xxix</sup> See JAC Website: <https://www.judsonisd.org/departments/special-education/district-programs/judson-achievement-center-jac>.
- <sup>xxx</sup> See GOALS Website: <https://goals.roundrockisd.org/>
- <sup>xxxi</sup> Natalie Haddad, 2022, Round Rock ISD Administrator Accused of Pushing Student into Wall, Causing Injury to his Head, *KVUE*, <https://www.kvue.com/article/news/investigations/defenders/video-round-rock-isd-student-pushed/269-c8f18955-f78c-4209-b0bd-211bb60236fa>.
- <sup>xxxii</sup> Email correspondence from Round Rock ISD to DRTx on July 8, 2024