Unprecedented and Unmasked: An Analysis of How District Policy Documents Frame Special Education during the COVID Crisis

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Abstract: COVID-19 school closures disrupted special education. In Fall 2020, districts sought to reopen schools, recover from the shocks of the pandemic, and implement special education to serve students with disabilities. Using policy document data from the United States’ 25 largest school districts, we surface patterns in how districts communicated problems and solutions related to special education for the 2020-21 school year. Drawing on concepts from framing theory, we analyzed messaging on special education embedded in 71 district policy documents. Specifically, we assessed the nature and foci of 520 special education policy frames. The 520 frames contained ideas on problems and solutions regarding special education. Results indicate that this set of districts foregrounded how to implement the compliance and intervention models of special education in their formal communication but devoted less attention to the equity model of special education. Districts rarely defined underlying problems in special education implementation amid pandemic schooling. We discuss potential consequences of these patterns in messaging on special education. Finally, we present evidence- and theory-based recommendations for policy, practice, and
scholarship on the implementation of special education with attention to recuperating from pandemic-related impacts.

**Keywords:** special education; districts; policy; framing theory; COVID-19

**Sin precedentes y desenmascarado: Un análisis de cómo los documentos de política del distrito enmarcan la educación especial durante la crisis de COVID-19**

**Resumen:** El cierre de escuelas por COVID-19 interrumpió la educación especial. En el otoño de 2020, los distritos buscaron reabrir las escuelas, recuperarse de los impactos de la pandemia e implementar educación especial para atender a los estudiantes con discapacidades. Usando datos de documentos de políticas de los 25 distritos escolares más grandes de los Estados Unidos, exploramos patrones en cómo los distritos comunicaron problemas y soluciones relacionados con la educación especial para el año escolar 2020-21. Basándonos en conceptos de la teoría del encuadre, analizamos mensajes sobre educación especial integrados en 71 documentos de políticas del distrito. Específicamente, evaluamos la naturaleza y los enfoques de 520 marcos de políticas de educación especial. Los 520 marcos contenían ideas sobre problemas y soluciones con respecto a la educación especial. Los resultados indican que estos distritos enfocaron modelos de cumplimiento e intervención de educación especial en su comunicación formal pero dedicaron menos atención al modelo de equidad de educación especial. Los distritos rara vez definieron los problemas subyacentes en la implementación de la educación especial en medio de la escolarización pandémica. Discutimos las posibles consecuencias de estos patrones en los mensajes sobre educación especial. Finalmente, presentamos recomendaciones basadas en evidencia y teoría para políticas, prácticas y estudios sobre la implementación de la educación especial con atención a la recuperación de los impactos relacionados con la pandemia.

**Palabras clave:** educación especial; distritos; política; teoría del encaje; COVID-19

**Sem precedentes e desmascarados: Uma análise de como os documentos de políticas distritais enquadram a educação especial durante a crise do COVID-19**

**Resumo:** Fechamento de escolas por COVID-19 interrompeu a educação especial. No outono de 2020, os distritos procuraram reabrir as escolas, se recuperar dos choques da pandemia e implementar educação especial para atender alunos com deficiência. Usando dados de documentos de políticas dos 25 maiores distritos escolares dos Estados Unidos, exploramos padrões de como os distritos comunicaram problemas e soluções relacionados à educação especial para o ano letivo de 2020-21. Com base em conceitos da teoria do enquadramento, analisamos mensagens sobre educação especial incorporadas em 71 documentos de políticas distritais. Especificamente, avaliamos a natureza e os focos de 520 quadros de políticas de educação especial. Os 520 quadros continham ideias sobre problemas e soluções para a educação especial. Os resultados indicam que esses distritos focaram os modelos de cumprimento e intervenção da educação especial em sua comunicação formal, mas dedicaram menos atenção ao modelo de equidade da educação especial. Os distritos raramente definiram problemas subjacentes na implementação da educação especial em meio à escolarização pandémica. Discutimos as consequências potenciais desses padrões nas mensagens sobre educação especial. Por fim, apresentamos recomendações baseadas em evidências e teorias para políticas, práticas e estudos sobre a implementação da educação especial com atenção à recuperação dos impactos relacionados à pandemia.

**Palavras-chave:** educação especial; distritos; política; teoria do enquadramento; COVID-19
Unprecedented and Unmasked: An Analysis of How District Policy Documents Frame Special Education during the COVID Crisis

Due to the COVID-19 pandemic, schools shuttered and pivoted to remote learning in Spring 2020. States and districts advanced guidelines on and expectations for emergency remote schooling during Spring 2020. Additionally, they distributed devices and arranged internet hot spots to boost students’ access to remote schooling (Herold, 2020). During this early stage of the pandemic, leaders and teachers enacted an array of strategies to engage and instruct diverse students. These new ways of doing school, however, were simultaneously bumpy and inequitable for families, children, and educators (Agostinelli et al., 2020; Calarco, 2020; Kuhfeld et al., 2020). In particular, students with disabilities and their families encountered massive challenges with regard to the provision of special education services (Chung, 2020; Cotto & Woulfin, 2020; Fernández, 2020). The pressures and pivots of pandemic schooling detrimentally affected millions of students with disabilities (SWD) across the US (Fernández, 2020; Jackson & Bowdon, 2020; Mitchell, 2020; Zimmerman, 2020).

Educational leaders and teachers worked tirelessly, yet pandemic-related disruptions to both society and schooling upended the policies and practices of special education (SpEd; Schwartz, 2020; Tuchman & McKittrick, 2020). Across the US, district leaders encountered complex conditions for implementing SpEd during this unprecedented period (Tuchman & McKittrick, 2020). In response to guidance from the federal and state levels, districts modified aspects of their SpEd systems and activities, ranging from how they screen students and how they communicate with parents to the delivery of services (Jackson & Bowdon, 2020). Many schools waived supports for SWDs with few plans for compensatory services (Tuchman & McKittrick, 2020). Further, parents of SWDs reported gaps in services, failures in transposing accommodations to the virtual learning format, and regression in children’s skills and behaviors (Chung, 2020; Fernández, 2020). In sum, there is mounting evidence SWDs were left behind by pandemic schooling.

Reopening Plans and Frames for Fall 2020

To recuperate from extended school closure, in the summer of 2020 district leaders assembled and published reopening plans (Deliso, 2020). With the aim of preparing for the next phase of pandemic schooling and formulating new systems and activities to promote safety and learning, these plans addressed SpEd and a constellation of other elements of schooling (e.g., remote learning schedules, device distribution to facilitate online instruction, face mask protocols). Reopening plans are policy documents that communicate, via official, system-level messaging, what actors—from administrators and teachers to parents and school nurses—should do to meet the demands of pandemic schooling (Strunk et al., 2016). As such, we concentrate on formal, written, district-level communication associated with SpEd policy and practice.

Based upon previous sociological scholarship (Benford & Snow, 2000; Scott & Davis, 2007), we assert these reopening plans, in addition to other formal documents regarding reopening schools, contain numerous frames that highlight problems and solutions of special education. Each frame, or strategic policy message, defines a problem or solution related to implementing SpEd. Thus, the frames, or strategic communication, from reopening documents offer evidence for how districts planned to conduct SpEd implementation during this unprecedented period. The documentation and investigation of these COVID-era frames is vital because it unmasks district-level priorities and strategies for SpEd implementation.

This study analyzes frames addressing SpEd from district reopening documents. Our systematic analysis of these documents provides insights on districts’ strategic planning and
messaging regarding SpEd during this unprecedented period. As federal, state, district, and school leaders strive to respond to the protracted pandemic, it is crucial to understand the nature of plans for serving SWDs—who represent approximately 14% of public school enrollment and who may become further marginalized as a result of the COVID crisis.

**Purpose of the Study**

Using qualitative, interpretive policy analysis and framing theory, this article exposes a set of districts’ foci and strategies for SpEd implementation in 2020-21. Our analyses provide insights on how district leaders frame problems and solutions for implementing three coexisting models of SpEd during the COVID crisis: compliance, intervention, and equity. After explaining how districts framed SpEd, we then describe patterns in how district policy documents addressed complying with the Individuals with Disabilities Education Act (IDEA), adapting SpEd intervention services to suit new conditions, and working to advance inclusive approaches to serving SWDs. We report results from analyses of 71 documents from 25 large U.S. districts on the following two research questions:

1. What is the nature of district policy documents’ framing of special education?
2. How do frames reflect elements of three models of special education?

We determined most frames announced solutions for implementing elements of SpEd under the new conditions and constraints of pandemic schooling. And we reveal differences across districts in attention to three SpEd models, raising questions about how districts balanced the principles and practices of various SpEd models in 2020-2021. Our results on districts’ reopening plans have immediate policy relevance for administrators and policymakers who face new dilemmas (e.g., how to support educators as they aim to accelerate learning; how to screen students for disabilities who experienced gaps in instructional opportunities from Spring 2020-Fall 2021) and navigate new options (e.g., remote learning; online IEP meetings) in the SpEd arena. We also underscore the need to attend to how SpEd policies are framed to enable advancing inclusive, culturally sustaining approaches. Our results are timely as states and districts develop plans supported by $2.6 billion of dedicated SpEd funding from the American Rescue Plan Act of 2021 (Griffith, 2021). They are also timely as districts cope with school closure issues during the Omicron surge of January 2022 (Richards, 2022). Finally, our results identify elements of SpEd that were substantively affected by COVID conditions and, as such, would benefit from additional resources and supports to recuperate and foster equitable outcomes for SWDs and their families.

**Theoretical Framework**

This study applies framing theory to investigate the meanings of SpEd embedded in district reopening documents (Benford & Snow, 2000; Yanow, 1993). After explaining how district reopening plans from Summer 2020 function as de facto policy (Horsford et al., 2018), we delve into core concepts of framing theory and explain the structure and role of policy frames in organizational change.

District leaders create and disseminate a variety of documents (e.g., plans, mission statements, instructional schedules). These documents carry messages on policies’ formal, explicit meanings and their informal, implicit meanings (Hill, 2006; Yanow, 1993). Reopening plans, for instance, contain formal and informal conceptions of district policy. These documents, functioning as policy texts, matter because they reflect and contribute to actors’ discourse and their decision making (Spillane et al., 2019). Containing ideas about policy and structuring ongoing sensemaking processes, these documents play a role in implementation (Fernandez, 2011; Hill, 2006; Spillane et
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al., 2019; Strunk et al., 2015). With greater specificity to the SpEd domain, reopening documents are policy texts that shape actors’ SpEd implementation. For these theoretical and practical reasons, it is fruitful to analyze the messages and meanings embedded in reopening documents to respond to critical questions about how districts aimed to move forward with implementing SpEd in Fall 2020.

Framing Theory

Based in organizational sociology, framing theory concentrates on how strategic communication matters for change (Benford & Snow, 2000; Coburn, 2006). Framing theory centers on the way organizations and their actors create frames—and engage in framing—that strategically define problems and solutions to advance change (Coburn, 2006; Cress & Snow, 2000). Scholars use lenses from framing theory to analyze the communication of ideas that play a role in organizational change. Educational researchers have interrogated the framing of an array of issues in the education system, including reading instruction, educator evaluation policy, and teachers’ unions (Coburn, 2006; Goldstein, 2011; Woulfin, 2015; Woulfin et al., 2016). For instance, Coburn (2006) elucidated how a principal framed problems in and solutions for reforming reading instruction in their building. In this study, we apply framing theory to systematically study the messaging about SpEd from district reopening documents. In so doing, we interrogate the framing of SpEd during the COVID era and put forth a new coding system for future analyses of SpEd policy/practice.

Framing theory concentrates on how organizations and their actors construct and broadcast diagnostic, prognostic, and motivational frames (Benford & Snow, 2000). Diagnostic frames diagnose the current, pressing problems demanding attention, resources, and change (Coburn, 2006). For example, a diagnostic frame could articulate the problem of delays in holding IEP meetings during school building closures. In comparison, prognostic frames put forth a solution to foster organizational change (Benford & Snow, 2000). For example, a prognostic frame could declare that teachers will receive professional development on a phonics intervention program to resolve problems in delivering intervention services to dyslexic students. Motivational frames advance inspiring ideas for how actors can launch into action in their context (Benford & Snow, 2000).

Notably, organizations, such as districts, engage in diagnostic, prognostic, and motivational framing tied to particular policies. Therefore, examining the framing of SpEd during the COVID crisis can unveil priorities and intentions for SpEd implementation and, as such, yield insights on the potential future trajectory of SpEd implementation in these contexts.

This study applies lenses from framing theory to characterize the design and implementation of SpEd policy during the 2020-2021 school year. We systematically reviewed district documents that contain SpEd policy frames addressing numerous facets of SpEd. We then determined how the content of these frames reflected various models of SpEd. In the following section, we present relevant literature defining three prominent SpEd models.

Three Models of Special Education

SpEd policy includes myriad structural forces, ideas, and rules. Thus, the implementation of SpEd ranges from identifying SWDs and developing an Individualized Education Plan (IEP) for SWDs, to delivering specialized instruction and adapting school schedules to serve SWDs in the least restrictive environment (Bray & Russell, 2016; DeMatthews & Mawhinney, 2013; Stiefel et al., 2018). These facets of implementation reflect—and are steered by—three models of SpEd. Below, we unpack SpEd models which guide the beliefs and practices of administrators and teachers across the US.
Compliance, Intervention, and Equity Models of Special Education

This article revolves around three longstanding, overlapping models of SpEd: compliance, intervention, and equity (Lipsky & Gartner, 1997). Each model foregrounds different components of SpEd and offers ideas on different dimensions of SpEd. Table 1 summarizes core facets of the three models. Contributing to the complexity of implementing SpEd, the compliance, intervention, and equity models steer educators in different directions. That is, educators negotiate structures and conceptualizations from all three models as they implement SpEd. We do not seek to evaluate the efficacy of particular SpEd models; instead, we describe how these models influence implementation within districts and schools. Here, we define each model and its foci for SpEd implementation, and we provide sample frames to operationalize each model.

Table 1
Three Models of Special Education

| Characteristic                  | Model of Special Education |
|--------------------------------|-----------------------------|
|                                | Compliance                  | Intervention               | Equity                        |
| Major goal                     | Follow legal guidelines, such as IDEA | Treat the disability by delivered tailored interventions | Reach equity-oriented goals through inclusive, culturally sustaining practices |
| Focus of attention             | Education system            | Teacher                    | Student/family                |
| Theory of change               | If schools comply, disabled children will be properly served | If interventions are delivered, disabled children’s outcomes will improve | If schools address disability from the equity stance, they dismantle ableist structures and prioritize equitable outcomes for disabled children |
| Role of district/school administrator | Understand and follow SpEd regulations | Design systems and logistics so interventions are delivered | Frame the value of equity-oriented special education |
| Role of special education teacher | Follow IEP plus SpEd guidelines | Plan and deliver interventions | Support disabled students’ inclusion |

Relying on legal forces (e.g., IDEA, court cases on the provision of SpEd), the compliance model emphasizes meetings, paperwork, and monitoring activities, such as the quantity of delivered services and the timing of meetings to review IEPs (Individualized Educational Plans). The compliance model prioritizes educators following SpEd guidelines to uphold the rights of SWDs and their families (Osborne & Russo, 2021; Yell et al., 2012); see Table 1. A possible diagnostic
frame aligned with the compliance model could describe the problem when students are not placed in the least restrictive environment (LRE), and a prognostic frame could provide solutions so schools meet guidelines regarding screening students in a timely manner.

In comparison to the compliance model, the intervention model prioritizes delivering specialized services to students and concentrates on the nature of instruction as well as assessment for SWDs (Tomlinson, 2012; Vannest & Hagan-Burke, 2009). As part of this, the intervention places particular attention on collecting and analyzing evidence on the degree to which specialized services contribute to student progress (IRIS, 2021). A diagnostic frame matching the intervention model could acknowledge flaws in existing intervention services for students in certain disability categories (e.g., autism spectrum disorder, dyscalculia). And a sample prognostic frame could propose solutions so teachers can deliver tailored intervention services to SWDs through an online platform.

Finally, the equity model of SpEd elevates inclusive approaches to SpEd that battle the macro-forces of ableism and racism (Annamma et al., 2018; Theoharis & Causton, 2014). The equity model leans on the tenet that the inclusion of SWDs is a civil right. Students with disabilities “experience inequities inherent in the special education system, including segregated classrooms, limited access to the general education curriculum, and poor post-school outcomes” (Blanchett et al., 2009, p. 392). Importantly, the equity model admits that SpEd can contribute to gaps in opportunities and outcomes for students of color and white students (Connor et al., 2019; Skiba et al., 2008).

As such, the equity model directs attention to how SpEd policies and practices should improve conditions and outcomes for SWDs to reduce pervasive inequalities. Moreover, this model rejects the notion that access is sufficient and, instead, prioritizes the unique needs of SWDs. For example, a regulation on translating SpEd documents into different languages to be comprehensible by non-English speaking families would reflect the equity model. And the practice of delivering common professional development to general and special education teachers to promote inclusive approaches to teaching and learning is a practice reflecting the equity model (Woulfin & Jones, 2021). A sample diagnostic, equity frame could shine light on disproportionalities in diagnosing Black children with autism spectrum disorder (Constantino et al., 2020). A prognostic, equity frame could articulate strategies for improving IEP meetings to engage families of students of color in culturally sustaining ways.

As listed in Table 1, each model is structured by different regulations and resources and carries different conceptualizations of the nature of disability, the objectives of SpEd, and the “best” ways to serve SWDs. Some regulations and resources simultaneously steer, or enable, multiple models (Coburn, 2016). For instance, guidelines on how to follow reading intervention programs may link to both the compliance and intervention models of SpEd. Importantly, SpEd implementation is shaped by, and benefits from, the proper balance of the compliance, intervention, and equity models (Lipsky & Gartner, 1997). That is, if educators overly rely on a single orientation toward SpEd (e.g., an intense focus on compliance without considerations of intervention and equity), this may “tip the seesaw,” contributing to issues for students, educators, and schools. Following this, it is important to document and analyze how district policy documents reflected each model as a step in understanding SpEd implementation under COVID conditions. Our empirical results on district policy frames reflecting these models could support administrators to design infrastructure that re-sets, and ultimately improves, SpEd and promotes positive outcomes for SWDs.
Method

Data Sources

This qualitative study used data from the U.S.’s 25 largest public school districts to answer the following research questions:
1) What is the nature of district policy documents’ framing of special education?
2) How do frames address elements of three models of special education?

We aimed to determine patterns in SpEd framing in the 25 districts as they reopened for the 2020-2021 school year.

We sampled these urban districts, since, based on their enrollment of approximately 800,000 SWDs across 12 states (see Appendix A for demographic information), they allocate substantial funding toward SpEd and employ thousands of SpEd teachers/service providers. For instance, New York City Public Schools enrolls over 210,000 SWDs, Broward County Public Schools (FL) enrolls over 37,000 SWDs, and Cobb County (GA) enrolls over 14,000. Strikingly, the enrolled SWD population is equivalent to the full student enrollment of many mid-sized districts in the U.S. In light of the scale of this group of 25 districts, each district marshals substantial resources toward designing and communicating SpEd policy. Further, these 25 districts often function as the bellweather that other educational systems emulate and that media focuses on. Based upon these features, this set of 25 districts provides a robust source of data on district SpEd policy frames.

To answer questions about re-opening plans at this phase of the pandemic, we conducted a document analysis relying on publicly available documents from 25 districts. Several scholars have employed document analysis to gain insights on educational responses during the COVID-19 pandemic (e.g., Quezada et al., 2020; Sá & Serpa, 2020). Similarly, we elected to analyze policy documents to safely and systematically uncover information about how districts addressed issues regarding SpEd within the context of COVID-19 (Bowen, 2009). After searching and scanning the 25 districts’ official websites in September-October 2020, we compiled 71 documents for full review. Documents included district reopening plans submitted to the state department of education from each of the 25 sampled districts, memos and guidance documents from districts’ SpEd department websites, and other documents posted on how the district and its schools would approach reopening in Fall 2020. This was an appropriate set of documents for investigating the plans and priorities of districts for implementing SpEd. We treated each document as a policy text containing frames addressing the structures and practices of SpEd in the district (Spillane et al., 2019; Yanow, 1993).

Data Analysis

This study applied analytic techniques aligned with the constructivist worldview and grounded in the literature on framing theory (Creswell, 1994). The constructivist worldview led us to consider the meanings embedded in policy documents and enabled us to view the complexity of approaches toward SpEd (Creswell, 1994; Lincoln & Guba, 2000; Spillane et al., 2019).

To answer research questions about SpEd policy framing, we engaged in theory-driven qualitative analyses. Specifically, we read and analyzed each of the 71 policy documents to identify diagnostic frames describing a problem of SpEd, prognostic frames describing a solution regarding SpEd, and motivational frames offering inspiring ideas to promote changes in SpEd (Bowen, 2009; Coburn, 2006). Each frame contained a single idea associated with SpEd policy or practice. For instance, a frame could describe how special education service providers should communicate with families to schedule online services. Our analysis of the 71 documents identified 520 SpEd policy frames, and we treated each frame as a case of policy messaging (Yin, 1984).
We copied each frame into an Excel spreadsheet, listing one frame per row for systematic analysis and inputting contextual information for each frame (e.g., district name; state). Next, we coded each frame along several dimensions (e.g., diagnostic versus prognostic frame; whether the frame addressed the compliance, intervention, and/or equity models) in the spreadsheet; Appendix B provides the code book for this stage of analysis. The deductive codes focused on the nature of strategic frames, in addition to the major match between each frame and the three SpEd models. The two researchers developed and studied codes together, and we coded approximately 10 frames together before separately coding the full set of frames in the Excel spreadsheet. Then, as part of checking for reliable coding across the researchers, we randomly selected 15 frames coded by each researcher to discuss together to ensure agreement on applications of all codes (Armstrong et al., 1997).

After reviewing our coding of the SpEd policy frames, we tabulated the proportion of the 520 frames in various categories (e.g., diagnostic versus prognostic; aligning to compliance, intervention, and/or equity) and created data displays to determine patterns within and across districts. We also calculated the proportion of frames falling into a combination of conditions (e.g., prognostic frames addressing issues of intervention). In the next stage of qualitative analysis, we looked for themes, memoed, and reviewed documents to obtain contextual information on districts and their messaging (Creswell, 2014). Throughout stages of analysis, we sought to uncover how district policy documents broadcast ideas about SpEd during this phase of the COVID-19 pandemic.

Results

Our findings begin by describing the nature of diagnostic and prognostic SpEd policy frames. Next, we explain patterns in how frames reflected the compliance, intervention and equity models of SpEd. In so doing, we sketch the landscape of SpEd policy and practice in large, urban districts for the 2020-2021 school year.

Nature of Special Education Policy Frames

About 8% of SpEd policy frames from the 71 district documents were diagnostic; these frames defined implementation problems, challenges, and barriers. For example, Gwinnett County Public Schools’ reopening plan included the following diagnostic frame:

When the school closures happened suddenly last spring, our school leaders and teachers adapted quickly to move instruction online. That abrupt transition was very challenging, especially for our Special Education population. We simply were not prepared to replicate the instruction these students receive into a digital platform.

This frame articulates it was difficult to transition services to the remote learning format and, notably, constitutes an admission that the district had been unable to provide all services for SWDs during Spring 2020. Districts deployed diagnostic frames that defined issues in meeting the needs of SWDs, enumerated barriers for delivering SpEd services, and, at times, attributed blame for certain issues. Therefore, diagnostic frames within reopening documents acknowledged flaws in SpEd implementation due to the conditions and constraints of COVID schooling.

The majority of SpEd policy frames (92%), however, were prognostic. These frames proposed solutions for implementing SpEd beginning in Fall 2020. For example, Cypress-Fairbanks ISD framed a solution at the intersection of SpEd and health:
Teachers will wear a face shield instead of a mask when instructing hearing impaired students.

This prognostic frame put forth the solution that teachers could use face shields, as a portion of their personal protective equipment (PPE), to ensure hearing impaired students could see teachers’ mouth and lips to read lips, thereby facilitating communication and engagement. Prognostic frames broadcast a spectrum of ideas on how district leaders, principals, teachers, staff, and parents could tackle dimensions of SpEd in the remote, hybrid, and in-person formats. As such, prognostic frames from reopening documents delivered sets of ideas on how to solve SpEd implementation challenges as schools reopened.

**Trends in How Frames Addressed Models of Special Education**

Districts engaged in prognostic framing which communicated particular solutions regarding the policies and practices of SpEd. It is necessary to tease apart the content of these SpEd policy frames from this phase of the pandemic to gain a sense of district intentions and expectations for implementation. As such, we illustrate the nature of the solutions districts proposed regarding SpEd. Additionally, we expose how district frames balanced equal attention to the compliance and intervention models of SpEd, while addressing the equity model to a lesser extent.

**Frames Addressing the Compliance Model**

Across districts, 35% of SpEd policy frames reflected the compliance model of special education. As represented in Figure 1, compliance frames were often prognostic; these frames advanced solutions for enacting the compliance model of SpEd during the second year of pandemic schooling. For example, a policy document from Baltimore County, MD, included the following frame:

> Each student’s IEP shall describe the delivery of special education services in the distance format and may address service in a physical building (dually) if appropriate as in, or... a hybrid instructional model.

This prognostic frame specifies how IEP documents should delineate the particular format for services. The frame is providing a solution so that educators remain compliant with regulations associated with the writing of IEPs and the provision of services. Addressing compliance across alternate schooling formats (i.e., remote learning, in-person instruction, hybrid model), this prognostic frame presents ideas at the blurry boundary between compliance and intervention. That is, the frame communicates directions for writing IEPs, as a tool for compliance, and it also specifies how intervention services will be delivered in several instructional modalities.

Another district in Maryland, Prince George’s County, issued this frame reflecting tenets of the compliance model:

> IEP meetings will be scheduled and held virtually with parent permission in accordance with the Individuals with Disabilities Education Act (IDEA) timelines and procedures.
Figure 1
Proportion of Policy Frames by Special Education Model and Framing Type

Note: N=520 special education policy frames

The aforementioned prognostic frame underscores that scheduling and the meeting format must match IDEA regulations to remain in compliance with federal law. Much of the content and language within compliance frames was technical in nature and/or related to logistics regarding how SpEd services would be offered. Other compliance frames (see Table 2) focused on new protocols for online IEP meetings, how to revise services listed in IEPs for the remote learning format, and declarations that the district would remain compliant with IDEA during the pandemic. Notably, some compliance frames applied legalistic phrases, such as “in accordance with” and “to the extent possible,” that permitted, and even legitimized, modifications to SpEd during this crisis. Taken together, frames matching the compliance model aimed to provide guidance on how schools and educators could meet the guidelines of pre-existing SpEd policy even as COVID disrupted schools and society.

Table 2
Examples of Special Education Policy Frames from 25 Districts

| Model   | Frame                                                                 |
|---------|-----------------------------------------------------------------------|
| Compliance | “The SDP will follow state and federal law, regulations and guidance regarding the evaluation and re-evaluation of students who are thought to be eligible for or receive special education supports and services” (Philadelphia City, PA) |
|         | “Each student’s IEP shall describe the delivery of special education services in the distance format and may address service in a physical building (dually) if appropriate as in, or if BCPS transitions into, a hybrid instructional model” (Baltimore County, MD) |
|         | “IEP meetings will be scheduled and held virtually with parent permission in accordance with the Individuals with Disabilities Education Act (IDEA) timelines and procedures” (Prince George’s County, MD) |
|         | “The Special Education Evaluation Case Manager (ECM) will schedule a virtual meeting with the parent to review the referral information, explain the Procedural Safeguards, and review the Guide to the ARD Process” (Dallas ISD, TX) |
Frames Addressing the Intervention Model

Thirty-five percent of SpEd policy frames addressed the intervention model, issuing solutions for implementing myriad services during the 2020-2021 school year. As listed in Table 2, frames reflecting intervention often addressed how educators and related service providers would provide interventions to SWDs in the remote learning format. For example, Hillsborough County (FL) asserted via a frame in a Special Education department memo that:

- Special education and related services as identified in the IEP during eLearning may be provided in a variety of ways including the use of telephone calls, instructional support materials, internet based or virtual lessons and/or virtual therapies, and other available distance-based learning approaches.” (Hillsborough County, FL)

- “Speech Therapist to provide the direct or consultation speech/language services in the student’s IEP via teletherapy.” (Shelby County, TN)
This prognostic frame put forth the solution that, as part of remote schooling, SpEd intervention services could be delivered via multiple platforms, including Zoom and telephone calls. As such, the district sought to resolve issues in delivering SpEd instruction and related services while students engaged in remote schooling.

Similar to the above example, many districts advanced prognostic, intervention frames explaining how speech, physical, and occupational therapy services would occur in the online format, with therapists communicating with parents/guardians to schedule sessions. In this manner, it appears districts treated families as crucial for implementing the intervention model of SpEd under crisis conditions.

Within SpEd policy frames reflecting the intervention model, districts applied language stipulating the deployment of “appropriate certified personnel” and claiming services would be provided to the “greatest extent possible.” Thus, districts sought to assure educators and families that intervention services would be of a high quality and delivered consistently under rocky conditions. Yet questions remain around the degree to which interventions unfolded in the remote and in-person formats during 2020-21, as well as how districts moved beyond accessibility to serve SWDs and their families equitably (Chung, 2020). For instance, to what degree were SWDs engaged during remote instruction and/or intervention activities? And, how did districts address technology barriers as well as the digital divide to provide intervention services to SWDs from various demographic groups in the remote format?

**Frames Addressing the Equity Model**

In contrast to the proportion of district policy frames addressing compliance or intervention, approximately 30% of frames reflected the equity model of SpEd; see Table 2 for sample equity frames. Districts enrolling lower proportions of SWDs (i.e., Houston and Dallas) tended to advance a greater proportion of equity frames in comparison to other sampled districts.

Across the 25 districts, frames reflecting the equity model primarily addressed: 1) prioritizing the return of SWDs to school buildings for in-person learning opportunities; 2) building capacity for co-teaching to promote inclusive instruction for SWDs; and 3) altering safety protocols to serve SWDs in in-person schooling. As summarized in Table 1, the equity model and its frames place emphasis on how the district addresses systemic inequities while enacting SpEd. Thus, equity frames contained ideas on deep seated problems of ableism and racism, and they presented solutions seeking to produce more inclusive experiences and equitable outcomes for SWDs.

The majority of districts (14/25) issued frames describing how they would prioritize SWDs returning to in-person instruction. Returning students and educators/staff to school buildings does present safety challenges; however, remote schooling presents numerous challenges for quality, accessible learning opportunities for SWDs (Chung, 2020; Fernández, 2020). Thus, districts electing to prioritize in-person instruction for SWDs moved beyond equal access for SWDs, and they acknowledged the limitations of remote schooling for these oftentimes marginalized students.

By prioritizing in-person instruction for SWDs, districts engaged in equitable—rather than equal—treatment of SWDs (Galloway & Ishimaru, 2015; Virella & Woulfin, 2021). For example, San Diego Unified’s reopening plan declared: “We recognize the needs of our students and will prioritize services for communities with the highest level of need.” This prognostic frame characterized in-person schooling as a solution that would meet the specialized needs of SWDs. Additionally, this frame hinted that remote learning, while necessary for reducing virus spread, was insufficient for SWDs.

Also framing ideas on how SWDs would be prioritized to return to school buildings, Northside ISD asserted that their tiered approach “will allow for students who are most
academically in-need to return first.” Thus, prognostic frames communicated prioritized return of SWDs as a solution to enable the just enactment of SpEd during the 2020-2021 school year. It remains necessary, however, to check how implementation of this strategy proceeded for SWDs across districts (Resmovits, 2020). For example, how did families with various racialized identities make decisions about their children returning to school buildings (Cotto & Woulfin, 2021)? And, how did district and school leaders create positive, healthy learning conditions for SWDs when they return to in-person instruction?

Many districts (11/25) advanced equity frames containing ideas for bolstering co-teaching in the remote and in-person learning formats to serve SWDs in an inclusive manner. These prognostic frames explicated districts’ tactics for providing professional support (e.g., collaboration time, professional development) to SpEd and general education teachers to sustain inclusive instruction, thereby serving SWDs in the least restrictive environment amid crisis conditions. Professional development can support and refine co-teaching, enabling teachers to more deeply implement the equity model of SpEd (see Table 1) (Woulfin & Jones, 2021). As such, the equity frames associated with professional support for co-teaching are a marker of district-level commitment to inclusion reform as well as the equity model of SpEd.

Finally, some districts (7/25) issued equity frames delineating modifications to health and safety protocols (e.g., mask wearing, hand washing, temperature screenings) for SWDs as they return to school buildings. For instance, a policy document framed: “We will work with individual students as needed who may need assistance with wearing a mask” (Cobb County, GA). This prognostic frame acknowledged potential differences in SWDs skill and comfort with mask wearing and offered the solution of providing tailored support to students for mask wearing inside schools. Reflecting the equity model of SpEd, these frames reduced barriers to in-person schooling for SWDs by presenting solutions to ensure SWDs can be appropriately included in in-person schooling to gain access to key services. Additionally, these frames indicate that COVID-19 forced district leaders to design and enact new guidelines to safely integrate SWDs into the vastly different context of COVID-schooling.

Taken together, SpEd policy frames contained ideas for structuring and implementing the equity model in 25 large districts during this phase of the pandemic. As summarized in Table 2, these frames delineated several solutions for, as well as problems in, enacting the tenets of the equity model of SpEd. Our findings illuminate that district reopening documents incorporated ideas on how to foster inclusive educational opportunities for SWDs and maintain the health and safety of students and educators.

**Variation in Equity Framing.** Although each district issued equity frames, there was considerable variability across the 25 districts in the proportion of frames addressing this model of SpEd; see Figure 2. Over 55% of SpEd policy frames from San Diego Unified (CA), Broward County (FL), and Montgomery County (MD) reflected the equity model. These three districts’ reopening plans and related policy documents included a larger proportion of equity frames as compared to the majority of sampled districts. Moreover, these three districts’ policy communication (Spee & Jarzabkowski, 2011; Strunk et al., 2016) devoted greater attention toward integrating SWDs and compensating for disruptions in SpEd services as compared to other sampled districts. It would be beneficial to study how these districts developed equity frames during Summer 2020 as well as how these frames shaped SpEd implementation.
Strikingly, in six of the sampled districts, less than 15% of SpEd policy frames aligned to the equity model. It would be important to unpack why these districts, including New York City Public Schools, Los Angeles Unified, and Cypress-Fairbanks (TX), allocated such limited attention to the equity model of SpEd in reopening documents. It could be useful to check how other resources from these six districts address equity, inclusion reform, and SpEd more broadly. Finally, it remains necessary to analyze how the nature of districts’ equity framing influenced the structures and practices of SpEd during multiple years of pandemic schooling. For example, how did principals, teachers, paraprofessionals, and service providers situated in different districts respond to equity frames? By answering this question, we could understand more about the translation of policy frames into practice.

**Discussion**

Attending to the barriers and uncertainties of COVID-era schooling, our study analyzed the framing of SpEd by 25 public school districts for the 2020-2021 school year. We determined that frames contained in district policy documents attended to multiple components of SpEd policy and bracketed thorny issues in the SpEd arena during this phase of the pandemic (Horsford et al., 2018). These ‘on paper’ frames were colored by the serious pressures to safely re-open schools for children, families, and educators.

Frames drew attention toward the structures, conceptualizations, and activities related to the compliance, intervention, and equity models of SpEd. Districts’ framing of SpEd attempted to make
some issues center stage (e.g., SpEd services in the remote learning format) while downplaying other issues (e.g., ongoing problems to deliver inclusive instruction). In this way, these frames point to emergent issues in the SpEd arena during this phase of pandemic schooling.

Containing ideas for administrators and teachers, SpEd policy frames were resources for sensemaking as well as negotiation for district and school leaders, teachers, service providers, parents, and advocacy organizations (Coburn, 2006; Spillane et al., 2019; Yanow, 1993). Our results provide a foundation to comprehend what was foregrounded versus neglected by this set of districts. By messaging how actors should address issues in their work, it is also probable these frames steered SpEd implementation in the COVID-era (Spee & Jarzabkowski, 2011). It remains important to track how actors encountered district policy documents, how actors were motivated to implement solutions, and how actors changed practices after encountering SpEd policy frames.

**Balance of Antecedents and Solutions**

Our analysis reveals that district policy documents rarely employed diagnostic frames that acknowledge, or give shape to, problems in implementing SpEd amid the constraints of pandemic schooling. For instance, very few frames mentioned the extent to which intervention services were disrupted during Spring 2020. Thus, we surface the district-level strategy of whispering—rather than hollering—about unprecedented disruptions to schooling, particularly for SWDs (Bateman & Tuchman, 2021; Schwartz, 2020). Our results on the smaller proportion of diagnostic framing match results from Coburn (2006) and other scholars (e.g., Cress & Snow, 2000; Woulfin et al., 2015) in which actors articulate fewer diagnostic as compared to prognostic frames. At the same time, we urge districts to engage in more robust diagnostic framing on SpEd that concretizes gaps and barriers for educators, families, service providers, and others. These frames could define underlying problems in the SpEd arena and, ultimately, garner support for additional resources and change.

Scholars across political science, public policy, sociology, and education bemoan that inundating actors with solutions contributes to solutionitis (Cohen, 1972; Cohen et al., 2017; Weiss, 1989). Our analyses reveal that, in comparison to defining antecedents, districts put forth an abundance of prognostic frames with solutions for “fixing” SpEd. Figure 1 depicts the preponderance of prognostic frames, particularly on equity and intervention. We propose that broadcasting solutions represents a first step for implementing SpEd under intense conditions. However, in the absence of clarity on what is causing obstacles for SpEd implementation and motivation to change structures and practices, deeper types of organizational change to meet the needs of SWDs in the COVID-era may be stymied (Coburn, 2006; Cohen et al., 2017).

**Insufficiencies of Equity Framing**

District policy documents devoted less attention to solutions for reducing inequities for SWDs in Fall 2020. Overall, frames vaguely addressed how to institute the equity model of SpEd whilst reopening schools; see Figure 2. Strikingly, only 5 of 520 frames from district documents addressed the nexus of race and SpEd. Instead, districts’ frames put forth color-evasive problems and solutions associated with SpEd (Annamma et al., 2016). This silence on the intersection of SpEd and race is pernicious, especially during the period encompassing the Black Lives Matter movement for racial justice and COVID-19 (Brennan, 2020; Ladson-Billings, 2021; McKinney de Royston et al., 2020; Silva, 2020).

It is vital that the future design, planning, and implementation of SpEd further prioritize serving SWDs at the intersection of marginalized identities (Annamma et al., 2018; Hernández-Saca et al., 2018). As part of this hard re-set of SpEd policy and practice (Ladson-Billings, 2021), districts should craft and broadcast resonant frames reflecting the equity model to motivate teachers, staff,
and other leaders to improve SpEd implementation. Further, district and school leaders should evaluate the disproportionate effects SpEd policy shifts might have had on students of color with disabilities and their families as the pandemic proceeds.

Limitations

The 520 frames reflect planning efforts of the U.S.’s 25 largest districts, rather than representing efforts from the country’s full range of districts. There remains a need to analyze SpEd framing across varied school systems (e.g., mid-sized districts, rural districts, charter management organizations). Additionally, the analyzed frames provide a snapshot of SpEd policy and practice at one time period: Fall 2020. Thus, they do not permit longitudinal analysis of changes in how districts framed particular models of SpEd prior to the environmental shock of the COVID-crisis.

Another limitation is that we investigated intended, rather than enacted, SpEd policy for the 2020-2021 school year. Specifically, to answer our research questions, we analyzed the on-paper public frames associated with district SpEd policy. It could be fruitful to gather and analyze artifacts that were not publicly communicated or disseminated, since they may incorporate alternate ideas on SpEd policy and practice in the COVID-era.

It would also be fruitful to investigate how district and school leaders conducted the on-the-ground work of implementing SpEd (e.g., developing educators’ understandings of SpEd, monitoring services, communicating with families) over the course of the pandemic. This research could include interviews with leaders and teachers to gain a sense of how they interpreted district policies and how they interacted to implement dimensions of SpEd. We note that district and school leaders were overburdened with the tasks of reopening schools in 2020-2021, presenting barriers for conducting interview research. Taken together, these lines of research could flesh out the dynamics by which SpEd frames from policy documents influenced the activities of teachers and leaders in the context of pandemic schooling.

Implications and Conclusion

Our framing-theory driven analysis of district policy documents function as a reminder that policymakers, leaders, and researchers should account for how SpEd policy was designed, modified, communicated, and implemented during the COVID crisis. In particular, we urge state and district administrators to carefully examine district policy artifacts to comprehend what was emphasized versus what was neglected vis-à-vis SpEd as the pandemic unfolds over three school years. While analyzing such documents, administrators should be attuned to the ways that SpEd models and their associated ideas are amplified or backgrounded. These steps could involve rethinking aspects of SpEd and schooling more broadly. Moreover, they could drive decision making on SpEd that catalyzes equitable implementation, enables reparation assisting SWDs and their families, and helps close chasms in opportunities, experiences, and outcomes for SWDs.

To bolster SpEd implementation and address pervasive inequalities during the protracted pandemic, district administrators should shift resources, planning, and framing to increase attention toward the equity model (Strunk et al., 2015). The American Rescue Plan Act provides significant funds for retooling SpEd; Connecticut’s special education state grant is approximately $2.2 million, and Texas’ is approximately $248 million (Ujifusa, 2021). We encourage administrators to deploy federal grant funding to promote change aligned to the equity model. These changes could assist with serving SWDs in an inclusive, culturally sustaining manner. First, administrators should design and then implement compensatory systems to strengthen learning opportunities for SWDs in engaging, holistic ways (McKinney de Royston et al., 2020). Relatedly, compensatory services should
be culturally sustaining, attend to students’ social and emotional learning, and delivered in an inclusive, as opposed to segregated, manner (Gay, 2002). These services would ensure students as well as families feel justly supported and prepared to reach positive educational and life outcomes.

Second, district leaders should build the capacity of leaders and teachers on how the interactions of disability status, race, socioeconomic status, gender, gender-identity, and multilingual status affect SWDs’ experiences and outcomes. Anti-ableist, anti-racist professional learning opportunities would help support leaders and teachers to more deeply implement the equity model of SpEd. These learning opportunities should be extended duration and should confront the ableist and racist impacts of the protracted COVID crisis (Garet et al., 2000). As part of this, professional development facilitators should deliver frames on the inequities of schooling for SWDs throughout the pandemic.

Third, leaders and teachers should create and amplify frames reflecting the equity model that can influence others’ ideas on—and motivation for—change. These motivational frames could include responsive, caring ideas on how to serve SWDs and their families in equitable ways. Through this, educators and other actors would be motivated to engage in new, meaningful types of work to narrow opportunity gaps for students with intersecting identities.

We caution that if districts do not make these pivots, they could revert to exclusionary approaches to SpEd, especially while inundated with tasks to keep buildings open, refine EdTech adoption, and enact interventions to counter the COVID slide (Griffith, 2021; Kuhfeld et al., 2020). Therefore, we urge state-level administrators to offer clear guidance and ongoing support to district leaders as they create—and implement—plans addressing multiple components of SpEd and aiming to foster healthy learning and working conditions for all children and educators. These steps can support the coherent implementation of SpEd in a manner benefiting children and youth and their broader communities.

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## Appendix A

### Table A1

Demographic Information of Sampled Districts

| District                         | Number of Students | % Eligible for Free or Reduced-Price Lunch | % Students with Disabilities | % Black  | % Hispanic (any race) | % Asian | % White |
|----------------------------------|--------------------|------------------------------------------|-------------------------------|----------|-----------------------|--------|---------|
| New York City, NY                | 1,078,050          | 75                                       | 20.3                          | 29.9     | 40.7                  | 13.2   | 28.3    |
| Los Angeles Unified, CA          | 644,460            | 81                                       | 13.2                          | 7.8      | 73.1                  | 5.9    | 48.1    |
| Chicago, IL                      | 367,890            | 64                                       | 14.7                          | 37.5     | 45.2                  | 4.1    | 36.1    |
| Miami-Dade County, FL            | 361,990            | 73                                       | 9.8                           | 23.1     | 64.4                  | 1.2    | 69.5    |
| Clark County, NV                 | 346,495            | 75                                       | 12                            | 13.0     | 45.1                  | 6.9    | 53.2    |
| Broward County, FL               | 269,295            | 42                                       | 13                            | 38.3     | 31.6                  | 3.3    | 49.5    |
| Houston ISD, TX                  | 239,700            | 75                                       | 7                             | 25.4     | 62.4                  | 3.4    | 57.7    |
| Hillsborough County, FL          | 210,925            | 63                                       | 14.1                          | 21.6     | 35.8                  | 3.6    | 60.4    |
| Philadelphia City, PA            | 187,555            | 80                                       | 14.4                          | 52.4     | 23.9                  | 6.6    | 25.2    |
| Orange County, FL                | 193,730            | 75                                       | 12                            | 26.1     | 38.1                  | 4.2    | 55.9    |
| Dallas ISD, TX                   | 191,015            | 68                                       | 8.2                           | 22.4     | 64.8                  | 1.2    | 65.9    |
| Palm Beach County, FL            | 187,755            | 44                                       | 15.4                          | 28.2     | 31.5                  | 2.7    | 61.3    |
| Gwinnett County, GA              | 177,690            | 56                                       | 12.5                          | 30.9     | 28.5                  | 9.5    | 42.2    |
| Fairfax County, VA               | 177,465            | 34                                       | 13.6                          | 11.1     | 20.6                  | 19.1   | 55.3    |
| Wake County, NC                  | 171,200            | 33                                       | 12                            | 24.0     | 16.1                  | 6.7    | 57.3    |
| Charlotte-Mecklenburg, NC        | 165,550            | 51                                       | 9                             | 38.1     | 20.5                  | 5.5    | 42.6    |
| Montgomery County, MD            | 152,310            | 25                                       | 11.2                          | 22.1     | 26.3                  | 13.2   | 44.4    |
| Prince George’s County, MD       | 130,475            | 66                                       | 11.6                          | 63.0     | 27.8                  | 2.7    | 12.4    |
| Duval County, FL                 | 128,320            | 52                                       | 14.3                          | 42.0     | 11.8                  | 4.2    | 44.4    |
| San Diego Unified, CA            | 122,270            | 63                                       | 13                            | 8.9      | 47.4                  | 13.9   | 56.0    |
| Cypress-Fairbanks ISD, TX        | 116,360            | 54                                       | 8.1                           | 17.7     | 44.0                  | 8.7    | 59.8    |
| Shelby County, TN                | 115,935            | 80                                       | 10.5                          | 77.1     | 10.1                  | 1.4    | 13.6    |
| Cobb County, GA                  | 113,080            | 29                                       | 13.4                          | 32.0     | 19.9                  | 5.0    | 49.3    |
| Northside ISD, TX                | 108,880            | 36                                       | 11.7                          | 6.8      | 66.9                  | 3.4    | 78.7    |
| Baltimore County, MD             | 107,360            | 44                                       | 12                            | 38.1     | 8.6                   | 6.6    | 46.7    |

*Note: Demographic data from https://nces.ed.gov/programs/edge/TableViewer/acsProfile/2018#; Percentage of students with disabilities data from https://ocrdata.ed.gov/search/district*
## Appendix B

### Table A2

**Code Book**

| Type of frame | Code    | Definition of the code                                                                                                                                  | Example frame meeting the coding criteria                                                                 |
|---------------|---------|--------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------|
| Diagnostic    | Frame communicated a problem in SpEd policy or practice | It is challenging to provide occupational therapy services in the online format                                                                      |
| Prognostic    | Frame communicated a solution for SpEd policy or practice   | We will provide additional professional learning opportunities to special educators on increasing engagement in the online format |
| Motivational  | Frame communicated an inspiring message related to SpEd policy or practice | Special educators are the superheroes of pandemic schooling                                                                                           |
| Compliance    | Frame addressed meetings, paperwork, and mandated assessment procedures | District and school administrators should ensure IEP meetings occur on schedule                                                                        |
| Intervention  | Frame addressed the nature and delivery of specialized services for SWDs, including intervention instruction and related services | Special education teachers can use apps and manipulatives to deliver intervention services in the remote and hybrid formats |
| Equity        | Frame addressed procedures and practices associated with inclusion reform, inclusive approaches to SpEd, and culturally sustaining approaches to SpEd and to integrate SWDs | Special education teachers should collaborate with general education teachers, continuing push-in approaches in alignment with inclusion reform. |
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