

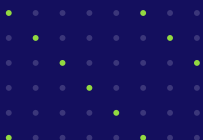
LEVEL DATA | TEXAS LEADERSHIP GUIDE

The 2026-27 Texas Special Education Readiness Playbook

How district leaders can strengthen service visibility, reduce compliance risk, and turn special education data into action

CREATED FOR

A practical guide for superintendents, special education leaders, data teams, finance leaders, and campus administrators navigating a pivotal year for special education in Texas.



EXECUTIVE BRIEF

A year when visibility matters more than ever

Texas special education leaders are entering the 2026-27 school year with a rare combination of pressure and opportunity. The state is transitioning to a new special education funding framework built around tiers of service intensity and service groups, while school systems continue to report under the prior instructional arrangement and setting approach during the transition year. That means many districts will be operating two reporting logics at the same time - and doing so while students, families, teachers, service providers, finance teams, and administrators expect services to begin on time and be documented accurately.

The operational challenge is larger than “getting the data submitted.” A district can meet a reporting deadline and still lack confidence that every student is receiving the services documented in the IEP, that schedule changes are reflected quickly, that missed services are visible early, or that leadership can distinguish isolated documentation gaps from systemic risk. The real readiness question is whether the district can see what is happening soon enough to act.

This playbook is designed to help Texas school systems build that visibility. It focuses on the practical connection between IEP requirements, service delivery, documentation, data quality, PEIMS readiness, leadership oversight, and funding. The goal is not more reporting. The goal is a stronger operating system for special education.

2026-27 A transition year	OCT. 8 First six-weeks PEIMS milestone	ACTION Visibility before reporting
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THE READINESS PRINCIPLE

Do not manage special education readiness as a deadline. Manage it as a visibility system.

A strong district can answer, at any point in the year: What services should be occurring? What services are occurring? Where are the gaps? Which gaps require immediate intervention? What has changed in the IEP? Is the data aligned across systems? And what will leadership do next?

1

The Texas special education landscape in 2026-27

Texas school systems are entering a transition year that changes both the mechanics and the management expectations around special education data. Under House Bill 2 and Senate Bill 568, the state is shifting from a funding model driven by instructional arrangement and setting to one in which student needs and the intensity of services are central to the funding calculation.

For district teams, that creates an immediate operational implication: the information used to describe a student's program must be more precise, more current, and easier to validate. A student's IEP is not simply a compliance document sitting upstream from reporting. It becomes a critical source of truth for the service-intensity information that ultimately flows into state data collections and funding processes.

The dual-reporting reality

During 2026-27, districts are expected to continue reporting the instructional arrangement/setting information associated with the prior system while also reporting the new service-intensity information. TEA guidance identifies the tier of intensity, applicable service group or groups, and the average number of minutes per instructional day spent in a special education setting as key transition-year data elements. This creates a temporary but significant reconciliation burden: teams must preserve continuity with the old framework while building accuracy in the new one.

The October 8 milestone

By the first PEIMS Attendance Submission reporting period, due October 8, 2026, TEA expects school systems to have reviewed IEPs in place as of the first day of school for at least half of students receiving special education services and entered the required intensity, service-group, and minutes information. That timeline makes the opening weeks of school operationally important. Districts that wait until the reporting window to begin validation may find themselves trying to reconcile IEP content, schedules, staff assignments, service documentation, and student data at the same time.

Funding will not be fully settled in real time

TEA has also cautioned districts that final funding levels under the new service-intensity approach will not be known until near-final settle-up after the school year. The state has described a transition safeguard intended to prevent districts from receiving less special education funding than they would have earned under the prior approach, but individual districts can still face planning uncertainty. For finance and special education leaders, the practical response is to separate two questions: "What will final funding be?" and "Do we trust the underlying student-level service data?" The second question is within district control today.

2

The visibility gap: where compliance risk actually begins

Special education compliance failures rarely begin with a single dramatic event. More often, they begin with small operational gaps that are difficult to see across campuses and systems: a schedule changes but a provider roster does not; a student transfers campuses and the receiving team does not immediately see service obligations; minutes are documented inconsistently; a provider absence creates missed services that are not escalated; or an IEP amendment changes services but downstream data remains stale.

The difference between documentation and visibility

Documentation answers: “Was something entered?” Visibility answers: “Can the right person see what needs attention?” A district may have thousands of service records and still lack a reliable way to identify students with missing, late, incomplete, or inconsistent documentation. Likewise, an IEP system can tell a team what should happen without automatically showing whether the planned services are actually being delivered as intended.

Operational gap	What it can look like	Leadership consequence
IEP change not reflected downstream	Service minutes or provider expectations remain based on a previous plan	Students may be underserved; reporting becomes harder to reconcile
Missed services are not visible quickly	Gaps are discovered weeks later through manual review	Corrective action becomes reactive and harder to document
Campus practices vary	Some teams document consistently; others rely on spreadsheets or local workarounds	District leaders lack a comparable districtwide view
Data lives in disconnected systems	IEP, SIS, provider notes, schedules, and state reporting data do not align	Staff spend time reconciling instead of intervening
Leadership sees lagging summaries only	Reports show what happened last month, not what needs action today	Risk accumulates before cabinet or central office can respond

A better operating question

A BETTER OPERATING QUESTION

Instead of asking, “Are our service logs complete?” ask, “Which students require action today?”

That shift moves special education operations from recordkeeping to management. It creates a hierarchy of attention: district teams can prioritize the highest-risk gaps, investigate root causes, support campuses, and document resolution before a small issue becomes a larger compliance or student-outcome problem.

3

Build a single operational view of services

Readiness improves when district teams can connect four layers of information: the student's current IEP requirements, the services scheduled or assigned, the services documented as delivered, and the exceptions that require follow-up. Those layers may live in different systems, but leaders need a coherent operating view across them.

The four-layer model

1. PLAN

What is the district obligated to provide? Capture current IEP service type, frequency, duration, location, group size where relevant, accommodations, related services, and effective dates.

2. ASSIGNMENT

Who is responsible for delivery? Connect students to campuses, providers, schedules, caseloads, and service calendars.

3. EVIDENCE

What actually occurred? Capture service delivery documentation consistently enough to compare delivered services with the plan.

4. EXCEPTION

Where is there a mismatch? Surface missing documentation, missed minutes, schedule conflicts, unresolved changes, or patterns that indicate a systemic issue.

What “single view” does not mean

It does not necessarily mean replacing every district system. It means reducing the number of places a leader must look to answer a basic operational question. Districts often already have an SIS, an IEP-authoring platform, HR or scheduling systems, and state reporting processes. The opportunity is to connect and normalize the right data so users can work from one trusted picture of service delivery and exceptions.

4

The first 60 days: a district readiness framework

The beginning of the school year is where districts either create visibility or inherit hidden risk. The first 60 days should be managed as a deliberate operating window with clear checkpoints.

Days 0-10: establish the baseline

- Confirm the active IEP and service requirements for every returning student receiving special education services.
- Identify students with summer ARDs, amendments, transfers, or recent placement/service changes.
- Validate provider assignments, campus rosters, schedules, and access to service documentation tools.
- Confirm district definitions and ownership for the new intensity-of-services data elements.
- Publish escalation paths for questions that cannot be resolved at the campus level.

Days 11-30: monitor execution

- Track whether planned services have begun and whether documentation is occurring consistently.
- Review exceptions at least weekly: missing logs, unassigned services, provider vacancies, schedule conflicts, and high-risk student transitions.
- Compare campus-level patterns instead of treating every issue as an isolated student record.
- Begin reconciliation between IEP data and data being prepared for PEIMS.
- Create a central list of unresolved data definitions or interpretation questions and route them to the appropriate district, ESC, or TEA support channel.

Days 31-60: validate, escalate, and stabilize

- Complete and document the required intensity/service review work associated with the first six-weeks reporting milestone.
- Investigate any material mismatch between the current IEP, reported data, and actual service pattern.
- Escalate systemic issues to cabinet-level owners with named corrective actions and due dates.
- Review staffing or caseload constraints that are repeatedly contributing to missed or late services.
- Shift from start-of-year triage into a sustainable weekly/monthly monitoring cadence.

5

Connect IEPs, service delivery, documentation, and PEIMS

A common mistake is to treat PEIMS as a downstream reporting responsibility owned primarily by the data team. In special education, the quality of the report depends on operational information created far upstream. The IEP defines the obligation. Staff assignments and schedules operationalize it. Service records create evidence. Local data systems translate those realities into reporting elements. If those layers do not agree, the final submission cannot fix the underlying inconsistency.

Create a closed-loop validation process

IEP finalized or amended: Trigger a downstream review of any service elements, instructional arrangement implications, effective dates, and intensity-related fields.

Student/service assignment updated: Confirm provider, location, schedule, caseload, and system access.

Service delivery begins: Verify documentation is being captured with the district's required level of completeness.

Exception appears: Assign an owner, investigate cause, determine student impact, and document resolution.

Reporting snapshot approaches: Reconcile IEP, operational, and state-reporting data before certification - not after discrepancies are found.

Data governance questions every district should answer

- Which system is authoritative for each special education data element?
- Who can change each field, and what event should trigger that change?
- How quickly must an IEP amendment flow into operational and reporting systems?
- How are duplicate or conflicting records resolved?
- What exception requires campus action versus central-office action?
- Who signs off before a submission is considered ready?

6 Create leadership-level special education visibility

Special education visibility should not stop at the program office. In Texas, boards and senior leaders are being asked to engage more directly with student performance and special education oversight. The district needs a leadership view that is concise enough for decision-making but specific enough to expose operational risk.

A practical executive dashboard

Signal	What leaders should see	Why it matters
Service delivery	Students/services on track, at risk, or missing evidence	Shows whether obligations are being executed
Documentation	Missing or late records by campus/provider/service type	Identifies process and capacity issues
IEP change flow	Recent amendments not yet reconciled downstream	Prevents stale operational data
Caseload/capacity	High-load providers, vacancies, unassigned services	Links staffing constraints to student impact
Compliance indicators	Evaluation, transition, and other time-sensitive exceptions	Directs attention before deadlines are missed
PEIMS readiness	Records validated vs. still requiring review	Makes reporting progress visible to leadership

Use leading indicators, not only lagging indicators

A compliance report after a deadline is a lagging indicator. A list of students with unresolved service exceptions today is a leading indicator. A year-end staffing shortage report is lagging. A weekly view of unassigned or overloaded caseloads is leading. The more districts move toward leading indicators, the more time they have to intervene.

7 Turn service data into intervention, not just reporting

The most valuable special education data is not the data that creates the cleanest report. It is the data that helps a team decide what to do next. That requires routines that convert visibility into action.

A weekly exception-management routine

- 1. Generate a prioritized exception list.
- 2. Separate documentation-only issues from probable service-delivery issues.
- 3. Assign each issue to an owner with a target resolution date.
- 4. Escalate patterns that indicate staffing, scheduling, training, or system problems.
- 5. Document corrective action and confirm closure.
- 6. Review repeated exceptions to identify root causes.

Look for patterns, not just records

If one provider has a documentation gap, the issue may be individual. If an entire service type has the same gap across multiple campuses, the district may have a workflow or training problem. If one campus repeatedly has missed-service exceptions after schedule changes, the root cause may be local scheduling governance. Visibility becomes strategically useful when leaders can move from “which student?” to “what pattern is producing this?”

8 Prepare for funding uncertainty without losing operational control

The shift to service-intensity funding changes the relationship between program data and finance. For 2026-27, districts will operate with some uncertainty while the new model is implemented and final funding amounts are reconciled later. That uncertainty makes accurate underlying data more - not less - important.

Build a shared SPED + finance operating cadence

- Review changes in service intensity and service groups at an agreed cadence rather than only at reporting deadlines.
- Compare operational service patterns with budget assumptions and staffing models.
- Flag areas where service needs are changing faster than resource allocation.
- Maintain documentation for local assumptions used in forecasting during the transition year.
- Separate data-quality uncertainty from funding-formula uncertainty so leaders know what they can control.

Do not let funding become the only story

The new model is fundamentally tied to the intensity and nature of student services. That makes 2026-27 an opportunity to strengthen the district's underlying service-data discipline. A better operational record supports reporting and finance, but its first purpose should be ensuring the student receives what the IEP requires.

9

A 30/60/90-day district action plan

Window	Primary objective	Key actions	Evidence of readiness
0-30 days	Establish visibility	Validate active IEPs; confirm assignments; begin service monitoring; define intensity/service data ownership; launch weekly exception review.	Leaders can see unresolved service and data exceptions by campus and owner.
31-60 days	Reconcile and stabilize	Complete priority IEP review; reconcile IEP/service/reporting data; resolve systemic gaps; prepare first six-weeks submission.	District can explain why records are ready, not just whether fields are populated.
61-90 days	Operationalize	Move from launch triage to recurring monitoring; connect staffing and finance; review trends and root causes.	Special education visibility becomes a normal operating rhythm rather than a deadline project.

HOW TO USE THIS PLAN

Use the table as a cross-functional operating plan. Assign an owner for each action, review evidence of readiness at each checkpoint, and treat unresolved exceptions as leadership work - not simply data cleanup.

10

Readiness checklist and leadership scorecard

Use this checklist as a working session with special education, data/PEIMS, technology, finance, and campus leadership. A “no” should result in an owner and a date - not just a note.

Readiness area	Question	Status
IEP source of truth	We can identify the current IEP and effective service requirements for every student.	Yes Partial No
Change management	IEP amendments and service changes reliably trigger downstream updates.	Yes Partial No
Assignments	Every required service has a visible provider/owner or an explicit exception.	Yes Partial No
Documentation	Service delivery is documented in a consistent, district-defined workflow.	Yes Partial No
Exceptions	Leaders can see missing, late, or inconsistent service records without manual campus-by-campus investigation.	Yes Partial No
Escalation	There is a defined process for missed services, vacancies, scheduling conflicts, and unresolved data questions.	Yes Partial No
Data governance	The district has named owners and authoritative systems for new intensity/service data elements.	Yes Partial No
PEIMS reconciliation	The district reconciles IEP and operational information before certification.	Yes Partial No
Leadership view	Cabinet can review current service and compliance risk using a concise set of indicators.	Yes Partial No
Funding readiness	Special education and finance teams have a shared process for reviewing service-intensity changes and budget implications.	Yes Partial No
Continuous improvement	Repeated exceptions are analyzed for root cause, not simply closed one by one.	Yes Partial No

11

Where technology can reduce the burden

Technology cannot replace strong special education practice, clear ownership, or sound data governance. It can, however, reduce the amount of manual reconciliation required to see whether services are being delivered and where teams need to act.

Level Data's Brolly platform is designed around that visibility problem: bringing student, IEP, and service information into a more unified operating view so districts can track services, identify exceptions, and move from fragmented documentation toward actionable insight. Level Data's broader analytics approach also emphasizes turning district data into information leaders can use to understand impact and make decisions.

What to look for in a service-visibility solution

- Integration with the systems districts already rely on, reducing duplicate entry where possible.
- A clear comparison between planned services and documented delivery.
- Exception-based workflows that help users focus on what requires action.
- District, campus, provider, and student-level views without losing context.
- Role-based access and workflows appropriate for sensitive student information.
- Reporting that supports operational management, not simply retrospective compliance review.
- Enough flexibility to adapt as Texas reporting requirements continue to evolve.

THE GOAL IS NOT ANOTHER PLACE TO PUT DATA.

The goal is to create a trusted view that helps district teams know where to act before risk compounds.

12 Final takeaway: from compliance to confidence

The 2026-27 Texas transition will create new reporting tasks, new data definitions, and new funding questions. But the districts best positioned to navigate the year will not simply be the districts with the most complete spreadsheets. They will be the districts with the strongest operational visibility.

When leaders can connect the IEP to the service schedule, the provider, the delivery record, the exception, and the reporting data, compliance becomes easier to manage because the underlying operation is easier to see. Staff spend less time hunting for answers. Central office can support campuses more proactively. Finance can work from better information. And most importantly, districts can identify service problems earlier - when there is still time to fix them.

THE READINESS QUESTION

Texas special education readiness in 2026-27 is not about preparing for one deadline. It is about building a system that can answer, every week: Are students receiving the services they are entitled to receive, and do we know where action is needed next?

Sources and Texas guidance

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- Texas Education Agency. "89th Legislature Updates." Current through August 2026.
- Level Data product and brand context informed by current Level Data brand guidance and existing Brolly/ROI marketing materials. Product capabilities should be reviewed by Product/Legal before final external publication.

See special education service visibility in action
Learn how Brolly by Level Data can help district teams unify service data, gain visibility, and act earlier.