

WHO BENEFITS FROM THE RESPONSE-TO-INTERVENTION PROCESS?

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I. INTRODUCTION: THE INTENT OF THE RESPONSE-TO-EDUCATION POLICY INITIATIVE.

Academic performance of students in public schools has become a topic of national discussion, transcending the boundaries of state governance and local control. The question whether general and special education have failed children with learning disabilities and children struggling academically due to non-disability factors is at the forefront of the debate about a response-to-intervention (RTI) framework.¹

The intent of the RTI policy initiative is early identification of struggling students, their monitoring, early intervention through tiered instruction,² and assistance in determining students' eligibility for special education under Individuals with Disabilities Education Act 2004.³ The United States Department of Education is promoting RTI as a new method of identifying learning disabilities.⁴

The RTI initiative is well intended. The premise behind it is that academic performance of all student population will be enhanced because schools will offer instructional assistance to a broad scope of students, provide early intervention to struggling students, and identify students as having a learning disability when their response to validated intervention is dramatically

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¹ See generally Wendy F. Hensel, *Sharing the Short Bus: Eligibility and Identity Under the IDEA*, 58 HASTINGS L.J. 1147 (2007); Mark C. Weber, *Reflections on the New Individuals with Disabilities Education Improvement Act*, 58 FLA. L. REV. 7 (2006).

² The premise behind RTI is that schools identify students as having learning disabilities when their response to generally effective interventions is dramatically inferior to that of their peers. Lynn S. Fuchs et al., *Response to Intervention: A strategy for the Prevention and Identification of Learning Disabilities*, in EDUCATING INDIVIDUALS WITH DISABILITIES: IDEA 2004 AND BEYOND 273, 115-16 (Elena L. Grigorenko ed. 2008).

³ Joseph B. Tulman & Douglas M. Weck, *Shutting off the School-to-Prison Pipeline for Status Offenders with Education-Related Disabilities*, 54 N.Y.L. SCH. L. REV. 875, 887, n.69 (2009-2010).

⁴ Marc C. Weber, *The IDEA Eligibility Mess*, 57 BUFF. L. REV. 83, 84 (2009). Under the 2004 amendments, a state must permit, and a school district may use a response-to-intervention approach for determining whether a student is learning disabled. 34 C.F.R. §§ 300.307(a)(2), 300.309(a)(2)(i), 300.311(a)(7).

inferior to that of their peers. At this time, however, the RTI models, remain unsubstantiated, not standardized, and difficult to implement across disabilities and various age groups, while the RTI process lacks procedural safeguards, disciplinary protections, and qualified teachers. Accordingly, the RTI initiative will bring positive results so long as legislative intentions manifest in reality and the abovementioned impediments to its effective implementation are overcome.

This Paper evaluates benefits and drawbacks of the RTI policy initiative and explores the underlying purposes of the RTI approach. Part II explores the statutory framework of RTI under IDEA and outlines how the RTI methodology is implemented.⁵ Part III critically evaluates the benefits and drawbacks of the RTI process.⁶ It then analyzes the purposes of the RTI approach as they are interpreted in the process of its implementation, either as an early intervention methodology for identification of learning disabilities or as a tool for standards-driven education reform.⁷ Finally, Part IV discusses who will benefit from the RTI method and examines impact of the RTI process on the future of public education.⁸

I. BACKGROUND

A. *The Statutory Framework of RTI.*

1. Special Education Services Under IDEA.

The RTI policy initiative has been proposed within the statutory framework of Individuals with Disabilities Education Act (IDEA).⁹ The IDEA requires that states, which receive federal funding, provide all children with disabilities with a free, appropriate¹⁰ public

⁵ See *infra* Part II (outlining the development of the RTI under the federal special education law).

⁶ See *infra* Part III A (evaluating the benefits and drawbacks of the RTI approach).

⁷ See *infra* Part III B 1-2 (analyzing the purpose of the RTI and its explicit and implied objectives).

⁸ See *infra* Part IV (discussing beneficiaries of the RTI methodology and its consequences for public education).

⁹ 20 U.S.C. § 1401 (2006) (providing for free appropriate public education for children with disabilities).

¹⁰ As the holding in *Board of Education v. Rowley*, 458 U.S. 176 (1982), indicates, the word “appropriate” is difficult to define. According to the U.S. Supreme Court, the instruction must be individualized to meet the child’s

education (“FAPE”).¹¹ FAPE means “special education and related services” that meet state standards, in an appropriate school setting,¹² and in accordance with the child’s individualized education program (“IEP”).¹³

The “child find” provision of special education law mandates that school districts identify and evaluate all children with SLD.¹⁴ To determine whether the student has an education-related disability, the law provides for an evaluation process.¹⁵ Upon evaluation, children with SLD are eligible for services if they meet age standards, have a condition listed in the statute, and due to that condition, need “special education and related services.”¹⁶

2. A New Approach to Identifying Children with Specific Learning Disabilities (SLD).

The RTI initiative is gaining acceptance as a new approach to identifying children with SLD. The need to create a new approach was caused by complexities of the IDEA eligibility provisions and recent cases further restricting eligibility¹⁷ as well as by concerns about effectiveness of currently used methods of evaluating children for learning disabilities.¹⁸ A well-

unique needs with supportive services necessary to ensure that the child benefits from that instruction; however, schools are not required to maximize the child’s educational opportunities. *Id.* at 201 (“[T]o require . . . the furnishing of every special service necessary to maximize each handicapped child’s potential is . . . further than Congress intended to go.”) (internal quotations omitted) (emphasis added).

¹¹ 20 U.S.C. §1411(i); § 1401(3); § 1401(9) (defining “free appropriate public education”).

¹² The law requires that children with disabilities are to be educated, to the maximum extent possible, in their regular classes, with children who do not have disabilities. 20 U.S.C. § 1412 (a)(5) (providing that upon identifying a child with a SLD, the school must provide appropriate supportive services in the “least restrictive environment”).

¹³ *Id.* § 1401 (9)(B)-(D).

¹⁴ *Id.* §1412 (a)(3)(A).

¹⁵ *Id.* § 1414 (b)(3)(B).

¹⁶ *Id.* §1401(3)(A)(i).

¹⁷ *See Hood v. Encinitas Union Sch. Dist.*, 486 F.3d 1099 (9th Cir. 2007) (limiting the federal definition of learning disability by requiring that the condition not be able to be corrected within the regular classroom); *Alvin Independent Sch. Dist. v. A.D.*, 503 F.3d 378 (5th Cir. 2007) (ruling that despite child’s ADHD and misconduct, he did not need special education and related services because he had passing grades).

¹⁸ Critics challenge the reliability of IQ testing due to IQ measurement errors and state-to-state variations in how much discrepancy will support that a learning disability exists. Louise Spear-Swerling, *Response to Intervention and Teacher Preparation*, in *EDUCATING INDIVIDUALS WITH DISABILITIES: IDEA 2004 AND BEYOND* 273, 276-77 (Elena L Grigorenko ed. 2008). Furthermore, IQ testing has a negative impact of labeling on children with SLD.

founded concern over racial overrepresentation¹⁹ has further contributed to establishing a new process for identifying and meeting the educational needs of children with SLD.²⁰

Congress explained that “[t]he overidentification of children as disabled and placing them in special education where they do not belong hinders the academic development of these students . . . [and] takes valuable resources away from students who truly are disabled.”²¹ Accordingly, Congress concluded that the problem could be remedied by making funds more generally available to help struggling children.²² Thus, it amended the statute to permit local education agencies to use up to 15% of their funding for “early intervening services” for students “who have not been identified as needing special education or related services but who need additional academic and behavioral support to succeed in general education environment.”²³

As a result of these statutory provisions of the IDEA, the RTI approach emerged, by which children in early grades who are not achieving at a level commensurate with their grade receive more individualized and intense instruction, while at the same time continuing to attend their general classroom.²⁴ Thus, RTI is intended to allow schools to start providing targeted interventions to struggling students without waiting for formal identification of a learning disability. Those children who do not make adequate progress when exposed to intensive RTI methodology over a set number of weeks are deemed to have a learning disability.²⁵

¹⁹ See Thomas Hehir, *IDEA and Disproportionality: Federal Enforcement, Effective Advocacy, and Strategies for Change*, in RACIAL INEQUITY IN SPECIAL EDUCATION 219 (Daniel J. Losen & Gary Orfield eds. 2002).

²⁰ Concerns regarding improper eligibility determinations were at the forefront of the legislative debate during committee hearings, preceding the enactment of the IDEA 2004. Wendy F. Hensel, *supra* note 1, at 1159.

²¹ H.R. Rep. No. 108-77, at 84 (2003).

²² H.R. Rep. No. 108-77, at 106 (2003).

²³ 20 U.S.C. §1413(f)(1) (2004).

²⁴ Frank M. Gresham, *Responsiveness to Intervention: An Alternative Approach to Identification of Learning Disabilities*, in IDENTIFICATION OF LEARNING DISABILITIES: RESEARCH TO PRACTICE (Renee Bradley ed., 2002), available at <http://nrcl.org/resources/idsummit/gresham4.pdf>.

²⁵ 20 U.S.C. § 1414(b)(6) (2010) (“In determining whether a child has a specific learning disability, a local educational agency may use a process that determines if [he or she] responds to scientific, research-based intervention as part of the evaluation process.”).

B. The RTI Methodology.

RTI is a multi-step process of providing services to struggling students.²⁶ Teachers provide instruction at increasing levels of intensity and use the assessment results at each intervention level to decide whether the students need additional instruction in general education or referral to special education services. RTI models have several components in common: the specialized instruction includes three or four phases/ tiers of intervention,²⁷ relies on research-based instruction and interventions, and evaluates students to determine if they are progressing.

Consequently, the RTI process is intended to exclude from the learning disability category those children whose academic difficulties are caused by lack of adequate instruction.²⁸ The IDEA paves the way for RTI by providing that a child shall not be identified as a child with a disability if the “determinant factor” is lack of appropriate instruction in reading or mathematics.²⁹ Although IDEA does not compel the use of RTI, IDEA furthers its implementation by creating “early intervening services” funds within federal special education

²⁶ See generally Lynn S Fuchs & Douglas Fuchs, *A Model for Implementing Responsiveness to Intervention*, 5/1/07 TEACHING EXCEPTIONAL CHILDREN 14, at *1 (2007).

²⁷ To illustrate how RTI methodology works, the following is an RTI model developed by the National Research Center on Learning Disabilities: during Tier 1, a classroom teacher assesses learning progress of all students, identifies a subset who are potentially at risk for school failure, and then monitors their academic performance for 5 to 8 weeks during general instruction; “nonresponsive” children move to Tier 2, which offers intense tutoring in small groups by the classroom teacher using identical instruction content for 8 to 10 weeks in order to provide children with “academic boost” and at the same time to test students’ capacity to respond to general education; finally, those deemed responsive return to regular class instruction, while those whose progress is not adequate enter Tier 3 where students get evaluated by multidisciplinary teams to identify their strengths and weaknesses and receive a specially designed set of educational interventions for 8 or more weeks. Children who do not respond to intervention after this intensive instruction may be designated as having a learning disability based on their failure to respond to intervention while taking into consideration other factors. Douglas Fuchs, Lynn S. Fuchs & Pamela M. Stecker, *The “Blurring” of Special Education in a New Continuum of General Education Placements and Services*, 4/1/10 EXCEPTIONAL CHILDREN 301, at * 3 (2010).

²⁸ Fuchs, *supra* note 26, at *1 (concluding that “a central assumption is that RTI can differentiate between two explanations for low achievement: inadequate instruction versus disability”).

²⁹ 20 U.S.C.A. §1414(b)(5)(A)-(B).

funding to finance RTI.³⁰ The U.S. Department of Education regulations also promote RTI while urging the states to abandon IQ discrepancy method for determining learning disability.³¹

II. ANALYSIS

The realization that there is no clear demarcation between the able and the disabled students in the educational context and the rise in the number of students qualifying for special education services have created serious challenges for school districts and policy makers. The goals of the RTI approach reflect these challenges and highlight the need to extend intervening instructional services to students outside the traditional special education framework. This Part reviews the benefits and drawbacks of RTI and analyzes the purposes of the RTI approach as they are interpreted in the process of its implementation.

A. The Benefits and Drawbacks of RTI.

1. The Benefits of RTI.

Advantages of the RTI process include earlier identification of SLD, a stronger focus on prevention, and academic assessment of the student population in the context of general curriculum. RTI establishes early intensive instructional intervention for children who need it before their test score discrepancies emerge in grade three or later.³² Accordingly, students no longer would have to “wait to fail”³³ before they are eligible to receive help. For students who eventually are determined eligible for special education services, RTI will serve as an initial step

³⁰ See *id.* §1413(f)(1), (2)(B).

³¹ Weber, *supra* note 4, at 130.

³² Nat'l Joint Comm. on Learning Disabilities, *Responsiveness to Intervention and Learning Disabilities*, 28 LEARNING DISABILITY Q. 249, 252 (2005). See also Council for Exceptional Children, *Response-to-Intervention—The Promise and the Peril*, <http://www.cec.sped.org/AM/Template.cfm?Section=Home&Template=/CM/ContentDisplay.cfm&CONTENTID=8427> (last visited March 11, 2011) (“RTI has the ability to transform how we educate students—all students. With RTI, students may get the support they need as soon as they show signs that they are having difficulty learning, regardless of whether or not they have a disability.”).

³³ Council for Exceptional Children, *supra* note 32.

in intervention, assessment of their strengths and weaknesses and instruction methods that work well for them.³⁴

Moreover, RTI may help students who do not actually have SLD but are falling behind due to poor teaching practices, troubled home environments, or other non-disability factors. These students may prove to be responsive to early intervention and show improved academic and behavioral results. Thus, early intervention may decrease the number of children who are misidentified as needing special education services.³⁵

Last but not least, a potential advantage of providing early intervening services outside the conventional special education framework is that students might be subject to less of the stigma that accompanies identification as a special education student.³⁶ As a result, students with disabilities would be receiving initial help in an integrated educational environment and would suffer less emotional and psychological trauma.

2. The Drawbacks of RTI.

On the other hand, RTI presents several challenges.³⁷ There is disagreement about how much weight should be placed on the fact of failure to make adequate progress following the interventions in the determination of learning disability, and how many additional assessments should be undertaken.³⁸

First, the variation that exists between states and even school districts within a state in employing different RTI models and in implementation of RTI make it difficult to assess its

³⁴ Weber, *supra* note 4, at 132.

³⁵ Council for Exceptional Children, *supra* note 32.

³⁶ See Robert A. Garda, *Untangling Eligibility Requirements Under the Individuals with Disabilities Education Act*, 60 MO. L. REV. 441, 444 (2004).

³⁷ See generally Kenneth A. Kavale, James M. Kauffman, Randy J. Bachmeier & Cretchen B. LeFever, *Response-to-Intervention: Separating the Rhetoric of Self-Congratulation from the Reality of Specific Learning Disability Identification*, 6/2//08 LEARN. DISAB. Q. 135 (arguing that RTI model is “conceptually flawed, practically inadequate, and politically rather than scientifically motivated”).

³⁸ Council for Exceptional Children, *supra* note 32.

effectiveness. Given such variation, it will be hard to ensure that teachers use only “scientific research-based” instructional techniques. Lack of standardization and protocol³⁹ might leave individual schools and regular teachers without special education credentials providing inadequate interventions, which, in turn, will lead to skewed results of the academic intervention.

Second, although the RTI method promises a contextual evaluation of children, it also bears the risk of eliminating large categories of children from eligibility. Some scholars anticipate that RTI assessment process will fail to identify high-ability students with learning disabilities who perform at grade level but could benefit from special education.⁴⁰ Thus, the RTI approach may result in an improper reduction in the number of children found eligible for special education services because students who are capable of performing adequately in the classroom will not be identified for special education services since intervention is triggered only by a child’s poor academic performance.⁴¹

Third, it is difficult to determine whether the RTI approach actually reduces the number of children needing special education services or schools receive a directive to make less referrals to special education programs. Finally, scientific techniques employed in RTI models often prove ineffective,⁴² while feasibility of the RTI method for all subjects and ages is still unknown.⁴³ Therefore, compliance problems and lack of substantiated methodology and qualified teachers may impede effective implementation of RTI.

³⁹ Margaret Gessler Werts, Monica Lambert & Ellen Carpenter, *What Special Education Directors Say About RTI*, 9/22/09 LEARN. DISAB. Q. 245, at *1 (2009). Also, if RTI is a method of evaluation, should not notice of its use be given to the parents and should not be their consent obtained? See C.F.R. § 300.304(a) (2008); §§ 300.301-.311 (providing that under IDEA parents are entitled to notice and the opportunity to give or withhold consent to evaluation). This problem also raises a due process question, which is beyond the scope of this Paper.

⁴⁰ Tonya R. Moon et al., *Twice-Exceptional Students*, in EDUCATING INDIVIDUALS WITH DISABILITIES: IDEA AND BEYOND 273, 295 (Elena L. Grigorenko ed. 2008).

⁴¹ Hensel, *supra* note 1, at 1167.

⁴² Fuchs, *supra* note 2, at 125-27 (discussing a serious gap regarding scientifically validated instruction).

⁴³ See Council for Exceptional Children, *supra* note 32 (“RTI . . . is not a ‘one size fits all’ process.”).

B. The Objectives of the RTI Approach.

Despite good intentions behind the RTI policy initiative, there exist important disagreements about the nature and purpose of the RTI approach in the context of its implementation: is RTI (1) a helpful instruction method for children with SLD who would otherwise be left struggling on their own until they fell behind enough to qualify for special education services, or (2) a standards-driven strategy employed by legislators and school districts to delay provision of special education to children with SLD and to reallocate some of the federal special education funding for the benefit of the general student population?

1. RTI as an Early Intervention Methodology and a New Approach to Disability Identification.

Proponents of the RTI policy initiative as part of the IDEA identify two goals as their objectives: effective early intervention and a new methodology for disability identification.⁴⁴ These goals are apparent from the legislative history of passage of IDEA 2004.

Prior to the reauthorization of IDEA in 2004, the regulations provided that in order to find a specific learning disability (SLD), the IEP team must identify “a severe discrepancy between achievement and intellectual ability.”⁴⁵ Some scholars argued that the severe discrepancy standard required students to fail before they could establish eligibility⁴⁶ and asserted that this standard placed improper emphasis on intelligence testing instead of focusing on child’s performance in the context of classroom instruction.⁴⁷ As a result of such criticism,

⁴⁴ Fuchs, *supra* note 27, at *2.

⁴⁵ 34 C.F.R. § 300.

⁴⁶ Stanley S. Herr, *Special Education Law and Children with Reading and Other Disabilities*, 28 J.L. & EDUC. 337, 355 (1999).

⁴⁷ Weber, *supra* note 1, at 26-27.

Congress eliminated mandatory use of the severe discrepancy standard⁴⁸ and permitted the use of a “scientific, research-based intervention as a part of the evaluation procedures.”⁴⁹

The RTI methodology is triggered when a student experiences academic difficulties in the classroom and uses research-based interventions to overcome these difficulties. According to Congress, the RTI approach would allow “eligibility for special education services [to] focus on the children who, even with these services, are not able to be successful”⁵⁰ and provide a “continuum of intervention options.”⁵¹

2. RTI as a Standards-Driven Strategy Benefiting General Student Population.

Others view RTI as part of the standards-driven education reform within the No Child Left Behind (NCLB) initiative⁵² and consider it a contributing factor to a proper education for everyone.⁵³ This objective implies that special education funding would benefit mainstream students, while “scientific, research-based interventions” would be used to help academically failing children to pass standardized tests so that schools meet their adequate yearly progress.⁵⁴

The risk associated with this approach is that the focus will shift completely to general education whereas identification of SLD will no longer be viewed as a major purpose of RTI.⁵⁵ Accordingly, the general education might absorb the federal special education money under the

⁴⁸ 20 U.S.C. §1414(b)(6)(A).

⁴⁹ *Id.* §1414(b)(6)(B).

⁵⁰ H.R. Rep No. 108-77, at 108 (2003).

⁵¹ S. Rep. No. 108-85, at 27 (2003) (defining a continuum of intervention options as a “regular and special educators and related service providers working together as part of a coherent system”).

⁵² The standards-driven approach started with the 1994 reauthorization of Title I of the Elementary and Secondary Education Act (ESEA), and continued in the 2001 reauthorization of ESEA, i.e. NCLB. “Two central components of the NCLB initiative are enhancement of teacher qualifications and accountability for learning results.” Weber, *supra* note 1, at 16.

⁵³ Fuchs, *supra* note 2, at *3.

⁵⁴ See Kelli D Cummings, Trent Atkins, Randy Allison & Carl Cole, *Response to Intervention: Investigating the New Role of Special Educators*, 3/1/08 TEACHING EXCEPTIONAL CHILDREN 24, at *2 (2008) (“Implementing [RTI] simultaneously addresses the needs of individual students who are struggling as well as assists school in meeting adequate yearly progress (AYP).”).

⁵⁵ Kavale, *supra* note 37, at *4.

auspices of providing early intervening services, while the objective of helping children with disabilities will be frustrated.⁵⁶

III. IMPACT: CONSEQUENCES OF THE RTI PROCESS.

Despite stark differences between these views about purposes of RTI, they both advocate early identification of struggling students. Ultimately, the preventive and remedial nature of the RTI approach allows for co-existence of these objectives, provided that in the end RTI advances interests of both children with SLD and general student body. Although many school administrators, policy makers, and scholars predict that RTI might result in blurring the line between special and general education,⁵⁷ the RTI initiative will have positive impact on effectiveness of general education and academic performance of all student population so long as the legislative intentions regarding the RTI initiative manifest in reality. As long as federal special education money is used for early intervening services for children who have not been formally found to have a disability but who need special education services, the marginal benefits that mainstream students will receive during the RTI process are only a plus.

If, however, the RTI process is abused to reduce the number of students who qualify for special education services while using the process itself to improve results of the general student body on the standardized tests, then the negative consequences of the RTI approach outweigh its benefits. While the goal of helping children perform well academically is commendable, the RTI is not a proper venue for improving academic results among the general student population if it is done to the detriment of children with SLD. Neither should the RTI process be used to

⁵⁶ Weber, *supra* note 1, at 22.

⁵⁷ See generally Fuchs, *supra* note 27 (describing that special education resembles RTI's most intensive instructional tier). See also Christy Chambers, *RTI Promises to Take the Failure out of the Special Education Process*, 6/1/08 DISTRICT ADMIN. S4, at * 2 (2008) ("RTI should be a hallmark of a unified approach by breaking down the separate silos of special ed and general ed.").

circumvent the eligibility determinations for special education services or delay qualifying students with learning disabilities for IEP.

Despite RTI's virtues, predictions about its long-term impact vary considerably: RTI could either strengthen special education or eliminate the field of learning disabilities.⁵⁸ Although RTI sprung from IDEA 2004 for the benefit of children with SLD, school districts might attempt to use an RTI framework to boost general education and bolster their academic results on standardized achievement tests. Thus, by arguing that early intervention within general classrooms will lead to fewer children who need special education services, some school district administrators hope to achieve redistribution of federal funding. Such commingling of funds and educational benefits might benefit mainstream students but will negatively affect children with disabilities by weakening the capacity of schools to provide intensive services.

Notwithstanding its drawbacks, the RTI framework might be a step toward establishing a unified system of early intervention that would benefit students with learning disabilities as well as those who fall behind due to non-disability factors. The use of class-wide early assessments has the advantage of not requiring a child to wait for a referral to special education before receiving help. Moreover, despite the novelty and substantial variability of the RTI models, RTI can potentially benefit a broad range of children by identifying more struggling children—not only those with genuine learning disabilities—than a typical referral process would.

Implementation of the RTI methodology will be successful, however, only if educators and policy makers manage to find a solution that will fulfill legislative goals behind the RTI initiative and overcome a two-fold danger of: (1) excluding from the RTI process children who could benefit significantly from special education programs despite performing well on

⁵⁸ See Council for Exceptional Children, *supra* note 32.

screenings and (2) including in the RTI process children who should be immediately receiving more intense special education services. If these dangers are avoided, the RTI process may become an effective collaborative approach to finding special education eligibility and school improvement overall. Finally, effective implementation of the RTI process and its objectives largely depends on the RTI model that is in place in a particular school district and on the dedication and professionalism of school administrators and staff.

IV. CONCLUSION

The RTI process is designed to identify struggling students early, provide intensive instruction and interventions, and help identify children with learning disabilities. It is a progressive framework; however, its conceptualization is incomplete and its drawbacks suggest moving cautiously in its implementation. Consequently, in implementing the RTI approach, administrators and educators must adhere to its statutorily defined purposes.

The RTI process should not be merely used to achieve “adequate yearly progress” among general student body while ignoring the needs of children with SLD. Neither should it delay the referral of a child who is suspected of having a disability for a comprehensive evaluation. Nevertheless, if intentions behind the RTI policy initiative manifest in reality, the RTI approach will transcend the boundaries of special education and create a collaborative unified system of early intervention and assessment within the context of general education curriculum for the benefit of all students.