Washington State Office of Superintendent of Public Instruction

April 24, 2025

Statewide System for Individualized Education Program

Feasibility Study

Table of Contents

Version	Author	Date	Description
1	Brian Christian Tom Baker Justin Palmer	3/28/2025	Draft for Stakeholder Review
2	Dr. Tania May Dr. Cassie Martin Eric Thornburgh	4/8/2025	Stakeholder Review Complete
3	Brian Christian Tom Baker Justin Palmer	4/11/2025	2nd Draft for Stakeholder Review
4	Dr. Tania May Dr. Cassie Martin Eric Thornburgh	4/22/2025	2nd Draft Stakeholder Review Complete
5	Brian Christian Tom Baker Justin Palmer	4/24/2025	Final

Section 1 Executive Summary

This feasibility study provides a comprehensive analysis and recommendation for the implementation of a statewide Individualized Education Program (IEP) system in Washington. An IEP is a legally mandated, individualized education program developed for each student that qualifies for special education services, designed to meet their unique learning needs and enable access to a free appropriate public education (FAPE). The primary objective of a future statewide IEP system is to improve outcomes for students with disabilities and enhance collaboration among teachers, parents[1], and students to drive towards those improved outcomes.

Washington's district-led approach to IEPs has resulted in a patchwork of technologies and processes, highlighting the opportunity to improve consistency, inclusionary practices and systems, and support better outcomes for students with disabilities through coordinated data-driven statewide efforts. It's essential to understand that an IEP should function as an adaptable resource to enhance teaching, always focusing on the individual student and providing a thorough, correct, and current understanding of their educational needs. A statewide IEP system seeks to tackle these existing problems by creating a single, unified platform to simplify procedures, improve teamwork among educators and support staff, and enable decisions based on reliable data. The aim is to move away from simply completing administrative tasks and toward a system where decisions are tailored to each student's unique requirements, supported by established procedures, address their core educational needs, and guarantee the creation of IEPs that are both well-designed and truly beneficial for their learning.

The feasibility study involved a detailed approach, including requirements gathering, market research, and solution fit/gap analysis that aligned to legislation and Washington Technology

[1] Definition of Parent(s) for the purposes of special education found at WAC 392-172A-01125

Solutions (WaTech) standards. Key user personas (students and parents, educators, and administrators) were analyzed to ensure the proposed system meets their needs.

Market research identified four viable IEP system vendors—Public Consulting Group (PCG), PowerSchool, Frontline, and Embrace—each with the capabilities to offer distinct areas of improvement across student outcomes, implementation, and support.

Because of the level of maturity of the market and viability of the offerings, the feasibility study recommends proceeding with an official procurement to select the most suitable vendor and solution. The implementation of a statewide IEP system is a significant undertaking that promises to transform special education in Washington, improve outcomes for students with disabilities, and measurably improve collaboration among all stakeholders. However, for an effort of this magnitude to be successful, there are other critical factors that must be considered beyond the selection of an IEP system vendor. The principal takeaways from this feasibility study consider those success factors:

- **Improving Student Outcomes**
    - A data-driven system that guides decisions, connects learning goals to grade level standards and supports students learning alongside their peers without disabilities will help every student grow, thrive, and reach their full potential.
- **Prioritizing Students and their Parents**
    - Students and their parents stand as the highest priority for the statewide IEP initiative. Currently, despite the use of various IEP systems across Washington, they report feeling significantly underserved due to a lack of accessible IEP systems, forms, and processes. Students and parents lack technological tools to monitor IEP progress or provide feedback. Parents often report feeling excluded from the IEP creation process and receive minimal education about their rights and roles as essential members of the IEP team. The statewide IEP effort aims to greatly improve student and parent access, involvement, and education within the IEP process. Furthermore, recognizing that language barriers can further marginalize already underserved groups, this initiative will prioritize the integration of robust

language access features within the statewide IEP system. Vendors, third party partners, internal partners, district staff, and educators will be expected to prioritize this fundamental shift towards greater parent involvement, ensure policies and processes reflect this commitment, and be prepared to measure and report their success in achieving it.

- **Current IEP Systems Users are Not Satisfied**
    - The study discovered that students & parents, educators, service providers, and administrators are largely unsatisfied with the performance of their current IEP systems. They cited a lack of accessibility, system flexibility, manual workarounds, manual report creation, lack of data integrations, and extraneous system layouts as chief concerns. The study validated this collective feedback against a list of critical future-state IEP system requirements and assessed each potential vendor against them.
- **Major Systems & Data Migration**
    - Washington practices a district-level authority model, and districts have adopted a variety of IEP systems, Student Information Systems (SIS), and other infrastructure to meet the needs of their students. A successful statewide IEP initiative must recognize that it involves a major transition, including the migration of both systems and data. This effort must apply the appropriate timelines, resources, and technical capabilities to successfully migrate each district's technology stack.
- **Data-Driven Insights**
    - A statewide IEP system will enable OSPI to collect and analyze consistent, high-quality data from every district in real time, creating a comprehensive view of how students with disabilities are progressing toward their goals, how services are being delivered, and where disparities or resource gaps exist. These insights will support more informed policy decisions, targeted technical assistance, and proactive interventions, allowing the state to shift from compliance focused oversight to a continuous improvement model.
- **OSPI will Govern the Effort**

- OSPI should become the principal strategic, operational, technical, and funding authority for the statewide IEP effort. It will direct the decision-structure, codify roles & responsibilities, and delegate support to create an effective organizational structure that is scaled to meet the statewide effort. It is important to note that the statewide IEP effort will be the catalyst for this shift in governance to OSPI. This process will necessitate specific attention and support in determining the appropriate involvement of all relevant parties to the statewide move. It will require careful consideration of existing relationships, technologies, and the diverse needs of stakeholders to ensure a successful transition and sustained effectiveness.

- **The Need for a Center of Excellence**
  - ISG recommends the establishment of an IEP Center of Excellence (COE) to support OSPI's governance role, ensure that stakeholders are provided representation, and develop a network for training, support, professional development, and IEP system-related requests. This COE also aims to balance statewide standardization efforts while respecting continued district-level autonomy.
- **Phased Implementation Approach**
  - A statewide IEP implementation effort should be organized into Pre-Implementation, Implementation, and Sustainment phases, with special emphasis on an Implementation Planning Study (IPS) during the Pre-Implementation phase. The IPS will allow OSPI to validate its system requirements, inventory district infrastructure for migration efforts, stand up its governance team, establish the COE, and formalize work plans.

Business Objectives

The primary objective of this feasibility study is to provide a comprehensive recommendation to the legislature for a statewide IEP system that improves outcomes for students with disabilities and increases collaboration between educators, parents, and students. The secondary goal of this feasibility study is to evaluate how the proposed IEP system will deliver key benefits such as enhanced oversight and data-driven insights for OSPI, and improved

communication and collaboration among educators, parents, and administrators, ultimately leading to better educational outcomes for students with disabilities. OSPI would be the governing steward and maintainer of the new, centralized system and therefore plans to support the platform from within OSPI.

The goals of investing in a statewide IEP system are to:

- Improve educational outcomes for students with disabilities by strengthening instruction and ensuring that special education services are designed to support meaningful progress in grade-level curriculum standards
- Improve collaboration between special education teachers, general education teachers, parents, and students
- Enhance OSPI's ability to provide governance through real-time data in collaboration with Educational Service Districts (ESDs) and Districts
- Create a comprehensive picture of a student that can help guide instructional decisions throughout their educational journey

At a minimum, OSPI is looking for a system that:

- Addresses gaps with data management & compliance
- Provides access to IEP data (e.g., across the community of students in the program)
- Integrates with other essential education systems and platforms across the state to support and monitor expected student progression
- Promotes a student-centered approach where the IEP serves as a meaningful tool for achieving grade-level standards rather than just a compliance requirement

Expected Costs

The viable solutions have estimated costs ranging from $53M to $90M over a 7-year period.

7-Year Costs Summary (Implementation + Maintenance & Operations)				
Cost Category	PCG	PowerSchool	Frontline	Embrace
Implementation	$10.6M	$20.6M	$15.4M	$9.6M
Maintenance & Operations	$58.7M	$69.3M	$37.3M	$31.8M
7 Year Totals	**$69.3M**	**$89.9M**	**$52.7M**	**$41.4M**
$/IEP over 7 Years	**$65.96**	**$85.60**	**$50.18**	**$39.41**

The first two years of the project are critical for understanding actual operational costs and adjusting budgetary requests for funding of the statewide IEP. Below is a breakout of the estimated year one and two costs for the statewide IEP effort. Depending on the chosen IEP vendor, the first two years are estimated to cost between $12M and $28M.

Years One and Two Costs Summary (Implementation + Maintenance & Operations)				
Cost Category	PCG	PowerSchool	Frontline	Embrace
Implementation	$7M	$12.7M	$6.9M	$6.5M
Maintenance & Operations	$12.6M	$15.6M	$5.1M	$5.8M
2 Year Totals	**$19.6M**	**$28.3M**	**$12M**	**$12.3M**

Included in these estimates are costs associated with the recommended implementation and operations & maintenance team. The project implementation team recommended is a mix of OSPI employees, third party consultants, and the vendor's professional services team. Workload projections for the implementation team are included in the 7-Year cost estimates and are presented in the Cost Benefit Analysis outlined in Section 11.

Expected Benefits

A statewide IEP solution will drive improved student outcomes and deliver substantial benefits to Washington's OSPI and special education network. Key anticipated benefits include:

- Enhanced oversight and compliance enablers for OSPI's governance role, with the potential to reduce compliance errors and audit findings across districts.

- Enhanced data-driven insights, including progress monitoring data, for policy adjustment and resource allocation, improving the timeliness and accuracy of state reporting and enabling more targeted interventions. This will provide a clearer and more consistent understanding of student progress across the state.
- Improved communication and collaboration between educators, parents and administrators, which helps to reduce delays in IEP development and service delivery.
- Expanded parent accessibility and transparency, with tools that support higher parent engagement and participation rates during IEP planning & review cycles.
- Greater educator access to student data and support tools, which enables more effective classroom planning and faster response to student needs.
- Streamlined reporting & compliance tools for all users, which reduces the administrative burden and time spent on documentation – potentially saving hours per IEP case annually.

Risks

Implementing a statewide IEP system to replace existing IEP tools can bring numerous benefits, but it also introduces certain risks and challenges that should be considered and mitigated. The top risks associated with this statewide IEP initiative:

Risk	Mitigation Approach
Uncertainty Regarding System Alignment: Absence of a detailed Student Information System (SIS)/Information System (IS) inventory at the district level prevents effective compatibility analysis with the statewide IEP, increasing integration risk.	Ensure that a systems inventory and interoperability assessment are addressed in pre-implementation planning. Prepare to deploy customized integrations where necessary for legacy systems that do not integrate via Application Programming Interface (API).
Data Migration: Moving local datasets to a single enterprise data host with varying technology levels across districts can prove difficult.	Develop a data validation plan during the pre-implementation phase. Dedicate a development team to solely package the differing existing data sets and integrate those manually into the enterprise data set. Conduct multiple rounds of test migrations before go-live.

District Level Authority: Districts have decision making authority on their own systems, potentially resulting in a lack of statewide adoption.	There will need to be active change management efforts and promotion efforts to get the districts to implement the new IEP system.

These risks and their mitigation methods are further outlined in Section 14, the Risk Management section of this study.

Section 2 Background and Needs Assessment

Current Environment Background

Washington's decentralized IEP landscape sees local districts managing their own processes for approximately 150,000 students with disabilities receiving special education through IEPs. Right now, these systems often act more like document repositories than dynamic instructional tools. This can create accessibility barriers for families and hinders their potential to drive improved student outcomes. The goal of a statewide IEP system is to shift this paradigm, ensuring IEPs become truly useful in the classroom and easily accessible to all stakeholders.

District-Level Authority

- Washington emphasizes local control, meaning each school district largely manages its own special education services and IEP systems that are aligned with State model forms. This leads to variations in how IEPs are developed, implemented, and monitored across the state.

Washington School Information Processing Cooperative (WSIPC)

- As a Public Non-Profit Cooperative, WSIPC currently manages the IEP system for 260 of the 295[2] Washington Local Education Agencies (LEAs) – approximately 88% of the statewide LEA footprint. It also manages the critical SIS, data storage, and information security infrastructure for 283 LEAs in the state, or 90% of the SIS and infrastructure. Finally, WSIPC hosts a support & advisory body which decides on required functionality and enhancement decisions. This body also supports districts with functional, data, and technical resources.

[2] https://ospi.k12.wa.us/about-ospi/about-school-districts

Varied Practices

- While local control has led to a variety of district-level IEP systems, this diversity now creates a valuable opportunity to establish statewide consistency across key areas, including:
    - IEP documentation and management.
    - Data collection and reporting.
    - Implementation of best practices.

OSPI's Focus on Improving Student Outcomes & Inclusion

The goal is to ensure that students with IEPs receive the individualized support they need to succeed, while also accessing grade-level standards and learning alongside their peers without disabilities.

- OSPI supports this goal through professional development and resources that facilitate effective curriculum alignment, directly linking it to improved outcomes for students.
- OSPI advocates inclusion through the Inclusionary Practices Technical Assistance Network (IPTN) through training of universal design for learning (UDL), provides data-driven district support to place students in Least Restrictive Environment (LRE), and integrates the Multi-Tiered System of Supports (MTSS) framework.

Challenges

- Recognizing the potential for inconsistencies to impact equitable access to the general education curriculum, rigorous instruction, and inclusive learning opportunities for students with disabilities, statewide alignment presents an opportunity to address these variations.
- Data management and reporting can be challenging due to the lack of a centralized system, while a statewide system will provide opportunities for LEAs to be more efficient and compliant.

- Ensuring consistent compliance with state and federal regulations remains a persistent challenge as LEAs must navigate complex requirements using varied systems and processes often without the benefit of standardized streamlined tools.
- Disparities in inclusive learning opportunities persist across student groups, particularly for Black students with disabilities, students with intellectual and developmental disabilities, and non-English-speaking students—who often face higher rates of exclusion from general education settings.

In essence, the current IEP environment is a mix of localized control with statewide efforts to improve consistency and inclusion.

Team & Roles

This section outlines the relevant teams and their associated roles within the current IEP environment.

OSPI

- As the principal funding, strategy, and operations authority for the statewide IEP initiative, OSPI leads governance, ensures policy compliance, manages state-level stakeholder engagement, and directs both the long-term sustainment and the statewide training and professional development efforts for the IEP system.

Students and Parents

- Central to the IEP process, requiring accessible, equitable, and transparent IEP solutions that promote their active participation, informed decision-making, and improve their student's outcomes.

Educators

- Responsible for the development, implementation, and monitoring of IEPs. Educators collaborate with parents and with each other, collect progress data, and ensure services are aligned with student needs, grade level curriculum standards & regulatory requirements.

Administrators

- Ensure the unique needs of their communities are met by balancing state requirements with local flexibility. They facilitate collaboration, oversee compliance, manage resources, provide instructional leadership, and use data to drive continuous improvement and trust in service delivery.

ESDs

- Bridging the gap between the state's education system and local school districts, they provide a range of services and technical support to improve the quality, equity, and efficiency of educational programs and services.

WSIPC

- A public non-profit cooperative empowers Washington school districts with technology services, systems integration, and support. They enable supplemental administrative operations, data governance, and data-driven decision-making.

Third Party Organizations

- Third-party professional services providers (e.g. consulting, project management, or technical support) used to supplement critical staffing for implementation and ongoing operations. Third parties operate under OSPI direct and do not replace core state functions.

Tools

The following tools are primarily used to support digital IEP management capability across districts:

SIS platforms

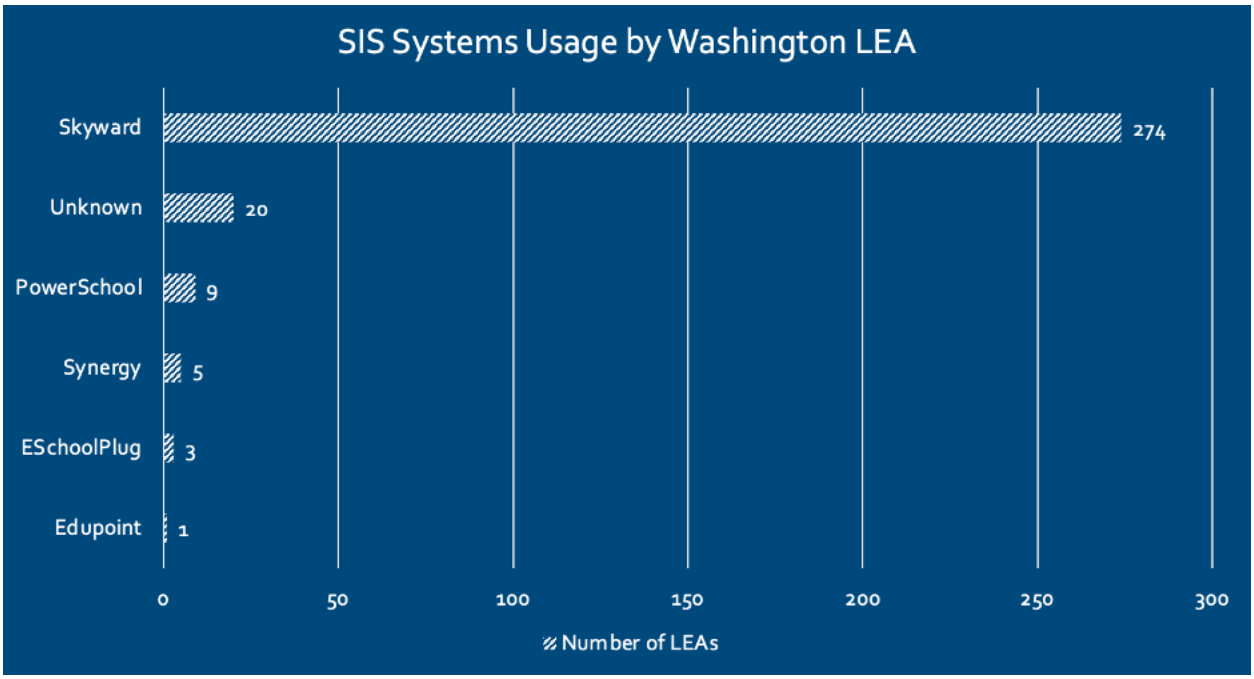
SIS is used by educational institutions to manage and organize student data. Functioning as a digital hub, an SIS handles a wide range of administrative tasks, including enrollment, attendance, grade management, course scheduling, and demographic tracking. These systems

streamline processes, improve data accuracy, and enhance communication between schools, teachers, parents, and students. By centralizing essential information, SIS solutions are a core component of modern educational technology, allowing institutions to efficiently manage student records and operations.

SIS Platform Usage by Washington LEA

SIS Platform	Number of LEAs Adopted	% LEAs Adopted	% Students
Edupoint / Synergy	1	0.3%	2%
eSchoolPlus	3	1%	4.2%
PowerSchool	9	2.9%	14.7%
Skyward	274	87.8%	68.4%
Synergy	5	1.6%	10.2%
Unknown	20	6.4%	.5%

SIS System Usage by Washington LEA



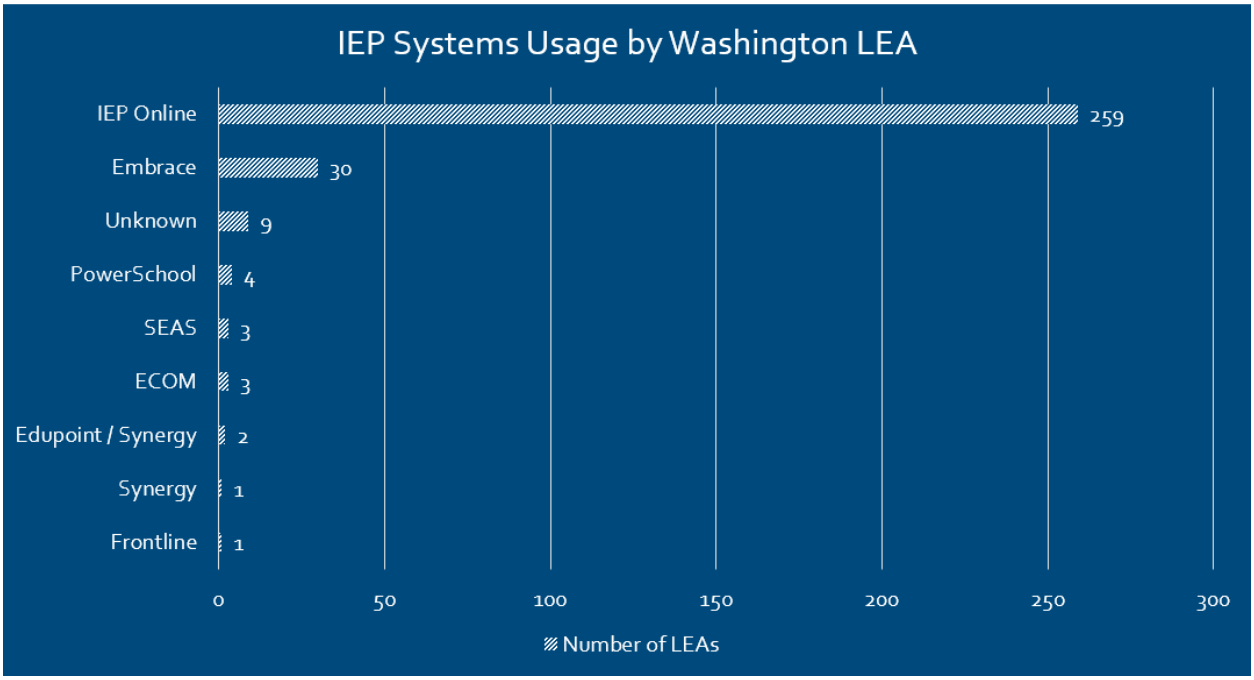
IEP systems

Vendors have developed systems that provide the framework for managing Individualized Education Programs, which are legally mandated plans designed to support students with disabilities that qualify for special education services. An IEP outlines a student's specific strengths and learning needs, educational goals, and the services they will receive. IEP systems encompass the methods and technologies used to create, track, and manage these documents. This can range from traditional paper-based methods to advanced digital platforms that facilitate collaboration, data management, and compliance monitoring. Innovative IEP systems are increasingly digital, enabling educators, parents, and administrators to efficiently develop, implement, and track student progress, ensuring that students with disabilities receive the necessary support to thrive in their education.

IEP System Usage by Washington LEA

IEP Platform	Number of LEAs Adopted	% LEAs Adopted	% Special Education Students
eCom	3	.96%	.7%
Edupoint / Synergy	1	0.32%	1.9%
Embrace	30	9.6%	7.6%
Frontline	1	0.3%	.1%
IEP Online	259	83%	81.2%
PowerSchool	4	1.2%	4.6%
SEAS	3	.96%	2%
Synergy	1	0.3%	1.7%
Unknown	9	2.88%	.1%

IEP System Usage by Washington LEA



CEDARS and EDS

Comprehensive Education Data and Research System (CEDARS) and Education Data System (EDS) are key systems that help schools and districts in Washington manage and report student data. CEDARS, the state's longitudinal data system, collects information on student demographics, academic performance, special education services, among other data points. This data supports schools in tracking student progress and meeting state and federal reporting requirements. EDS, OSPI's secure data portal, provides districts with access to tools for submitting reports, managing funding applications, and monitoring compliance.

Business Needs

The current district-led approach to IEP management in Washington, operating largely without consistent statewide guidance and support, presents significant challenges for districts, educators, students, and parents. These challenges include inconsistent data entry and reporting standards, time-intensive administrative processes undertaken at significant local cost, limited interoperability between locally managed systems, difficulty tracking compliance

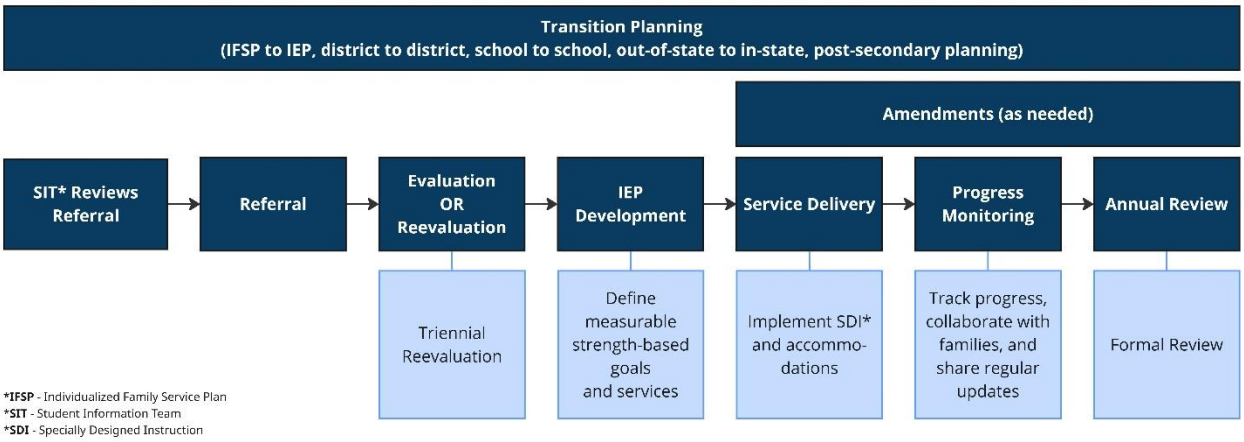
deadlines in a decentralized environment, and barriers to effective collaboration between stakeholders across different systems. Consequently, despite the dedicated efforts of districts, the quality and consistency of special education services can vary widely across the state. To address these challenges and enhance IEP service delivery, there is a critical business need for a unified, statewide IEP system that can deliver tangible improvements in student outcomes, streamline administrative processes, and ensure consistent compliance across all districts, thereby providing much-needed support to the ongoing efforts at the local level.

- **Improve Student Outcomes**
    - There is a need for more effective tracking of student progress and targeted interventions to enhance academic and developmental outcomes.
    - A statewide system will allow for better data collection, consistency, and analysis, which can be used to improve training for educators and resource allocation.
- **Enhance General Education Alignment**
    - The system must promote seamless integration of special education services with general education curricula, ensuring students with IEPs have greater access to and success within general educational settings.
- **Ensure Consistent Compliance**
    - There is a need to address the current inconsistencies in IEP management across districts to improve compliance with state and federal regulations.
    - A centralized system will provide standardized digital workflows and up-to-date regulation information, streamlining processes and embedding compliance mechanisms that significantly reduce administrative overhead.
- **Improve Data Management and Reporting**
    - A centralized platform is needed to enhance data management and reporting, providing valuable insights into student progress and program effectiveness.
    - This will enable data-driven decision-making and progress monitoring at school, district and state levels.

Core Processes

The IEP process is in place to ensure that students with disabilities get the right support at the right time with a focus on the unique needs of the student. It is a structured and legally mandated process involving many stakeholders, where parents play a critical role as an active member of the process.

IEP Process Map



The core processes within an IEP lifecycle are:

- **Student Information Team (SIT) reviews referral**
    - General education support team reviews concerns about a student's academic or behavioral challenges.
- **Transition planning**
    - IEP transitions ensure uninterrupted services as students move between stages – such as Individualized Family Service Plan (IFSP) to IEP, district to district, out of state to in-state, or into post-secondary life.
- **Referral**
    - A formal referral is submitted by parents, teachers, an agency, or other professionals received by the Washington Department of Children, Youth, and Families (DCYF) or a school district.

- **Evaluation or reevaluation**
    - A multidisciplinary team, including the parents, assess the student's academic, cognitive, behavioral, and physical needs where the parent plays a critical role in the process. Re-evaluation occurs, at minimum, every triennial to determine eligibility and service adjustments. All referrals require consent, in the form of prior written notice, prior to evaluation.
- **IEP development**
    - The IEP team collaboratively designs a measurable and strength-based plan, pinpointing essential services to drive the student's progress within the general curriculum.
- **Service delivery**
    - The goals and services are delivered through Specially Designed Instruction (SDI) where teachers and specialists implement using evidence-based strategies, ensure access to and progress in the general education curriculum within the least restrictive environment
- **Progress monitoring**
    - Parents receive regular updates and provide feedback on goal progress.
    - Providing insights and advocating for adjustments to the IEP team.
- **Annual review**
    - A formalized process where the IEP team can adjust goals, services and SDI as needed.
- **Amendments**
    - Through the service delivery, progress monitoring, and annual review process adjustments are made to the student's program based on changing needs and challenges as they arise and as needed.

User Personas & Journeys

User personas were created to validate the statewide IEP system requirements and ensure the chosen system will meet real-world needs. The key user groups identified include students and their parents, educators & service providers, and administrators. Journey maps were used to visualize how each user interacts with the IEP system, and highlight pain points, inefficiencies, and required features.

The study identified widespread systemic issues across all user levels of the current IEP systems.

For Students and parents, access to IEP progress, status, or the ability to provide feedback was reported as virtually nonexistent—a critical gap given OSPI's strategic commitment to empowering student and parent voice in the IEP process.

Educators described the systems as lacking core functionality, misaligned with actual process flows, and overly rigid. As a result, they are forced to rely on dozens of manual workarounds, duplicate data entry, and time-intensive report building—often exporting IEP data into other platforms just to complete their core responsibilities.

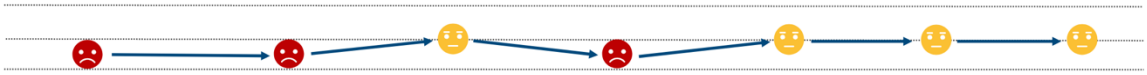
Administrators reported an inability to gain clear visibility into IEP performance, compliance status, or where educators and service providers may require support. The absence of built-in dashboards or performance reports within the IEP system forces administrators to manually compile data—often pulling it directly from the SIS due to either unreliable or inaccessible data within the IEP platform itself.

This study assesses that the current IEP systems in use across the state are drastically underserving the needs of their primary users and customers and are fundamentally misaligned with OSPI's vision for a modern, inclusive, and data-driven IEP program focused on student outcomes.

Students and Parents

- Underserved from an accessibility standpoint, e.g. poor language translation and no digital portal to see IEP progress or provide feedback.
- Invited to the IEP process in late stages as a reviewer rather than co-creator.
- Lack visibility into student progress or IEP process milestones.
- Possess critical insights that would enable a successful IEP for the student.
- Desire to be included more, provide feedback, and see that feedback is incorporated.

Student and Parent's Journey Map

Journey Stage	Referral & Evaluation	IEP Development	Service Delivery	Progress Monitoring	Annual Reviews	Amendments	Transition Planning
Activities *These activities represent an active user with IEP access	- Collaborate, understand, and provide input to the evaluation team during the evaluation of the student referral - If necessary, request an Individual Educational Evaluation (IEE) - Approve via Prior Written Notice (PWN) for "initial provision of services"	- Review IEP draft prior to or during IEP meeting - Attend IEP meeting(s) held to discuss and adjust IEP draft - Provide critical input, advocate, and ask questions to understand the draft IEP as a key member of the IEP Team - Approve IEP via PWN	- Student receives SPED services and works towards IEP goals - Advocate for needs and request accommodations for their educational experience to achieve successful outcomes	- Track progress, engage with goals, provide feedback to team - Observe, goal reinforcement, and provide insights on goal performance - Collaborate providing perspective and advocacy for adjustments - Approve via PWN	Attend and be an active member of: - Annual IEP review with IEP Team; pulling Student progress reports, notes, adjusting learning plans, and updating records - 3rd Year formal IEP re-evaluation - Approve via PWN	- Engage, advocate, and provide input for IEP goal modifications based on observations of progress and insights - Support new strategies and implementation - Approve via PWN	- Student aged 0-3 transition from IFSP to IEP - Student aged 16-22 shift to post-secondary education planning - Student transfer from school to school, district to district, etc.
Sentiment							
Feelings & Needs	- Families are frustrated when they request evaluations and are dismissed - Families were concerned when student was being evaluated without family knowledge & dialogue - Parents receive pre-completed evaluations, leading to confusion and frustration toward the rest of the IEP Team	- Difficult to understand IEP generated documentation by educators and specialists due to complex language, undefined acronyms, and lack of translations - Placement decisions were made prior to IEP meeting, caretakers were unaware of their rights - Draft IEP is not provided prior to meeting, leaving parents unprepared	- Lack of flexible signature options for the agreed-upon final IEP - Asked to come to multiple meetings despite busy schedules - Lack of insights into their student's SDI	- No access to IEP Tool to view student records and progress - Goal banks are deficit-focused and fail to capture student's strengths - Lack of flexibility to have goal input outside of eligibility of evaluation	- Single-meeting reviews reduce district burden but leave families feeling rushed and overwhelmed. - IEP Tool notifies IEP Team to meet when it is unnecessary - Tools prioritize compliance over inclusion and equity	- IEP Tool lacks notification tools when amendments are made leading to confusion an out-of-date information - Parents face resistance when requesting changes, often dismissed	- Frustration with delays of transferring IEPs due to manual processes and the processing of IEPs for students transferring from out-of-state or internationally, potentially hindering services
Future State Ideas	- Embed referral and evaluation process within the IEP Tool - Student and Caretaker complete access to the IEP Tool	- Automatic language translation for IEP planning documents - IEP Tool delivers draft IEP to families prior to IEP decision meeting - IEP Tool allows and tracks changes so parents can see their contribution	- An IEP Tool shares SDI across with families - An IEP Tool replaces the need for multiple meetings through digital collaboration and input and e-signatures	- Progress monitoring should include strategies & supports including SDI examples to enforce accountability - IEP Tool allows progress reporting to be shared with families	- IEP Team and families receive notifications of upcoming reviews, allows time for contributions & change requests - An IEP Tool displays IEP history during reviews	- Parents receive near real-time notifications and updates around IEP changes and meetings - Allow goal and plan changes without amendments	- Improve integration with community agencies and high-ed - Improve integration between schools and districts to ease transition process

Educators

- Strained for time, often managing multiple IEPs in addition to a regular educational workload.
- Desire to incorporate general education milestones and creative goal-banks, but lacking the resources & flexibility in their current IEP systems to do so.
- Understand the desires and needs of the student & parent but faces rigidity in work processes and resistance to IEP customizations.
- Possess advanced understanding of IEP capabilities, especially in terms of goal-banks and reporting.

Educator Journey Map

Journey Stage	Referral & Evaluation	IEP Development	Service Delivery	Progress Monitoring	Annual Review	Amendments	Transition Planning
Activities	- Document strengths, concerns, and needs within the Gen Ed setting, generating a supporting report - Initiate referral process after considering interventions and support within Gen Ed - Provide and receive PWN	- Create measurable, achievable, and evidence-based goals, in line with student's present level of performance within the Gen Ed curriculum - Assess and recommend interventions tailored to student's needs - Distribute draft IEP, make amendments, provide and receive PWN	- Collaborate with IEP Team to ensure student access to curriculum, participation in classroom, and progression towards grade-level standards - Receive OT, PT, etc. support as needed	- Observe and assess student performance towards goals - Document learnings from observations - Generate, review, and communicate reports with IEP Team - Provide and receive PWN	Attend and be an active member of: - Annual IEP review with IEP Team: pull student progress reports, notes, adjust learning plans, and update records - 3rd Year formal IEP re-evaluation - Provide and receive PWN	- Identify, provide input, and collaborate with student/ caretakers and specialists to make necessary changes. - Implement adjusted plans - Provide and receive PWN	- Engage student/ caretaker and IEP Team to ensure transition success - Collaborate and strategize on opportunities with past IEP Team members to support efficient and effective transitions
Sentiment							
Feelings & Needs	- Confusing behavior support forms: cannot distinguish assessment from intervention plans - Insufficient or delayed information from intervention providers - Insufficient data transfer from early intervention providers causes delays	- Current IEP Tools are overwhelmingly complicated, difficult to navigate - Lack ability to collaborate with other IEP contributors - Deficit-focused language in IEP processes, tools, and forms - Lack of integration between systems requires duplicate effort, manually download, upload info.	- Insufficient notification for IEP completion, no visualization or prompting that goals are achieved - Lack of delivery options forces IEP Team to call in-person meetings or email the IEP digitally	- Lack of integration across IEP Tools requires redundant data entry and manual processes - Fears of FERPA issues due to insufficient document storage - Lack of progress visibility via dashboards to get quick, easy, visual updates	- Lack of automated flagging for compliance issues - IEP often due before evaluations are due without Psych & providers being aware - Educators print out student evals to manually enter data	- IEP Tool forces evaluations when removing or adding services even when not legally required - Large disparity in Amendment usage between districts	- Student records do not transfer properly between districts (even with same IEP Tool)
Future State Ideas	- Implement a clear model to assist using forms effectively - Allow improved tracking of student strengths and needs between LEAs and other State agencies - Integrate with external State agency and 3rd party systems	- Pre-written goals aligned with core standards for students at or approaching grade level - Ability to note testing accommodations - Ability to write goals that are not standard-compliant	- Notifications to IEP Team for upcoming delivery dates - Digital IEP delivery methods including tracking & acknowledgement	**Tool to provide Educators:** - **Access to track student's strengths, challenges, and progress in the IEP** - **Enable tracking of progress towards goals**	- Meeting invitation generator that assists in pre-scheduling review meetings	- Questionnaire to enter amendment, then populate areas for updating - IEP Tool feature that allows "at a glance" views of student's qualifying history	- Transition tools within the IEP program to improve information transfers - Age-appropriate transition surveys built into IEP Tool

Administrators

- Have a strong desire to support students, parents, and educators with better data visualization, system flexibility, and compliance education.
- Are concerned about the inadequate data synchronizations between IEPs and district information systems, especially SIS.
- Remain focused on promoting improved compliance performance that aligns with improved student-centered outcomes.
- Need advanced data insights, trends, and direct recommendations to support programmatic decisions.

Administrator Journey Map

Journey Stage	Referral & Evaluation	IEP Development	Service Delivery	Progress Monitoring	Annual Review	Amendments	Transition Planning
Activities	- Collaborate on the evaluation to determine student qualification - Conduct evaluation results meeting, review analysis and interpret determination for services based on the student's needs	- Ensure compliance, resource allocation, oversight and accountability to ensure IEP adheres to policy and legal requirements - Facilitate collaboration and provide guidance to the IEP Team for thorough and equitable IEP development	- Verify IEPs are delivered as specified and meet legal requirements - Resolve challenges in service implementation with IEP Team - Track LRE data and service matrices: related vs direct services vs consultation	- Provide oversight and enforce accountability to ensure educators/ specialists track and document progress towards IEP goals - Review data for trends, identify barriers and recommend adjustments to services - Ensure compliance	- Provide oversight, multi-disciplinary viewpoin t and knowledge of regulations - Mediate and address concerns raised by IEP Team	- Ensure compliance with policy and legal requirements - Ensure student/caretaker are fully informed and aware of their rights throughout the process	- Facilitate coordination between current and receiving organizations, schools, and districts - Ensure compliance with policy and legal requirements - Provide guidance for IEP Team on best practices
Sentiment							
Feelings & Needs	- Lack of notification between DCYF and districts resulting in evaluation delays - Gaps in roster data making it difficult for SD support - No audit history to show previous decisions to assist in transfer evaluation	- Rigidness in formatting makes it difficult to align with compliance standards - Limitations in ability to input desired content using required system formatting cause frustration and delays	- Integration and standardization challenges due to multiple IEP Tools across districts - Variations in data quality, monitoring, and compliance hinder State compliance monitoring and support - IEP Tools limit 1 user to input data at a time and slow system performance	- Frequent non-compliant matrix schedules negatively impacting ability to monitor IEP goals - Lack of mechanisms to identify noncompliance - Progress reports are not linked to IEP - Limited ability to customize dashboards or define district metrics	- Tool makes decisions forcing a reset of the IEP vs Team having flexibility to amend IEP to accommodate students changing strengths and needs		- Delay and inefficiencies accessing student records during transitions - Districts can no longer access progress monitoring notes, assessment findings, or medical records to evaluate
Future State Ideas	- Better communication mechanisms between Pre-K, Kindergarten tools (e.g. ACORN, Skyward, IEP Tool) - Ability to see Gen Ed records for students, source of referral, reason for not qualifying	- Communicate and provide feedback with families without needing to call a meeting - Improved flexibility to align with compliance standards by integrating supporting systems (e.g., Medicaid consent time frames)	- IEP Tool flexibility to allow IEP descriptions vs. current rigid data fields - Include historical records during transfer of the IEP - Tool should include service logs to analyzes billable hours and rates	- Ability to enter progress information live, and auto update into present levels of performance for the student - Strengthen and ease data collection to improve reporting capabilities, which reduces in-person and manual workarounds	- Automatic compliance indicators like annual review dates and non-compliant plans - Review scheduling widget in the tool that sends calendar invitations	- Track building admin contact attempt records to track communication about amendments - Allow electronic signatures to remain intact for minor updates	- Embedded notification of age to IEP Team when the student turns 17-18 years old - Digital consent for student information sharing with State agencies

Journey Mapping Summary

The current state feedback provided in the journey mapping efforts was prioritized in several areas of the feasibility study:

- Pain points, feature requests, and future state ideas were validated against the IEP system requirements list.
- Repeated, systemic issues informed the strategic assessment and their severity informed vendor scoring weights.
- Thematic, resource, and process-related concerns were incorporated into the recommended future-state staffing model and implementation plans.

Business Opportunities

The opportunity to develop and implement a statewide IEP system in Washington is not just about addressing current inefficiencies but about building a foundation for innovation and future advancements in special education.

- **Statewide IEP Processes**
  - Statewide adoption of the IEP platform and supporting business processes, administration standards, and reporting formats will improve efficiency, and provide special education staff with more time for important service delivery work.
  - Standardized work processes will allow for consistent training, professional development opportunities, and a statewide networking opportunity for special education staff to further improve the IEP delivery process.
- **Improved Student Outcomes Through Advanced Data Analytics and Personalized Learning**
  - A centralized system enables advanced data analytics and reporting, allowing for data-driven decision-making, progress monitoring, and improved student outcomes.

    - This foundation can foster personalized learning platforms, creating opportunities for educational technology integration that can come from existing technology as further needs or priorities arise.
    - The system allows for better data collection and analysis, which in turn allows for better training of educators, and better resource allocation.
    - This opportunity also allows for increased transparency within the special education system, building trust with the community.
- **Enhanced General Education Alignment**
    - A statewide IEP system promotes seamless integration of special education services with general education curricula, fostering inclusion and equitable learning experiences.
    - Prompting of general education alignment during the IEP creation phases improves the cycle time of IEP creation and reduces the administrative burden on educators and administrators.
- **Improved Accessibility and Collaboration**
    - The system can allow for better sharing of data between general education teachers and special education teachers.
    - Furthermore, the system can facilitate the integration of accessibility features and assistive technologies, (e.g. translation services) benefiting students with diverse needs.
    - Interoperability with other educational systems expands its utility and potential for collaboration.
- **Incorporating High Technology for Sustainment & Scalability**
    - As artificial intelligence (AI) becomes available and matures, the system would provide a robust framework for integrating AI-powered tools to further personalize learning.
    - AI and machine learning methods can automate administrative tasks, freeing up educators to focus on student needs.

- Predictive analytics can enable proactive student support, identifying potential challenges, and facilitating timely interventions.
- A cloud-based platform ensures scalability and accommodates future growth.
- Ongoing updates, enhancements, and AI integration ensure the system's sustainability and relevance.

Business Service Goals

The core business service goal of a statewide IEP system is to improve student outcomes, empower stakeholders, and ensure regulatory compliance. This platform will streamline processes, enhance collaboration, and drive data-driven decision-making, while prioritizing accessibility and championing the success of students with disabilities. OSPI serves three primary customer groups through the statewide IEP system: students and their parents, educators, and administrators. Each group has unique needs and service delivery goals, outlined below.

Students and Parents

- **Empowered Participation and Accessibility:**
  - Design a user-friendly and accessible platform, empowering parents and students with transparent access to IEP information.
  - Ensure clear communication and facilitate active participation in the IEP process.
  - Focus on student-centric outcomes and driving measurable improvements in student achievement and progress through high-quality, individualized IEP development and implementation.

Educators

- **Efficient Tools and Professional Growth:**
  - Streamline administrative workflows and automate key processes to reduce burdens.
  - Offer integrated professional development resources and training to support educators in implementing evidence-based practices.

- Enable seamless communication and collaboration among all stakeholders through secure information sharing.

- **Data-Driven Instruction**
  - Capitalize on comprehensive data collection, progress monitoring, and analysis tools, to produce IEPs.

Administrators

- **Compliance and Data-Driven Management:**
  - Guarantee consistent adherence to state and federal special education regulations with robust reporting and audit capabilities.
  - Implement comprehensive data collection and analysis tools, providing actionable insights and predictive analysis for continuous improvement of special education practices.

Statutory Requirements

Special education services and the development of IEPs are governed by both federal and state laws. Federally, the Individuals with Disabilities Education Act (IDEA) mandates that all eligible students with disabilities receive FAPE in an LRE. IDEA outlines procedural safeguards, IEP requirements, and accountability measures to ensure equitable access to education. Washington law aligns with IDEA while adding specific provisions for timelines, dispute resolution, and state oversight. WaTech will play a critical role in implementation ensuring that the platform meets state security, data privacy, and interoperability standards. Combined, these partners, laws, and regulations guide how IEPs are developed, implemented, and monitored to ensure compliance and support of meaningful educational progress for students with disabilities across the state.

Federal

IDEA establishes the foundation for special education services by requiring that all students with disabilities receive an education tailored to their unique strengths and needs through an IEP. IDEA mandates that IEPs be developed collaboratively by a team that includes parents, educators, and specialists, ensuring that students receive appropriate support and services. The law also enforces procedural safeguards, such as parental rights, due process protections, and regular progress monitoring.

Code	Description
IDEA Statute Chapter 33	Mandates that all eligible children with disabilities receive a FAPE in the LRE, ensuring individualized support through IEPs and procedural safeguards.
IDEA Part 303 (Part C)	Provides early intervention services for infants and toddlers (birth to age 3) with developmental delays or disabilities, emphasizing family-centered support to enhance development and facilitate transition to preschool services.
IDEA Part 303 (Part B)	Mandates special education and related services for children ages 3-21, ensuring access to a FAPE in the LRE through IEPs.
ESSA 20 U.S.C. § 6311	Focuses on accountability, equity, and state and local control over education policy, while aiming to improve academic achievement for all students, including those with disabilities.
FERPA 20 U.S.C. § 1232g	Protects the privacy of student education records and gives parents and eligible students rights to access, amend, and control disclosures of those records.
HIPPA 45 CFR Part 164	Establishes privacy and security rules for protecting individuals' medical records and health information, regulating how covered entities and business associates handle, store, and disclose protected health information (PHI)
ADA 42 U.S.C. § 12101	Prohibits discrimination against individuals with disabilities and ensures equal access to public services, accommodations, and employment opportunities.
504 29 U.S.C. § 794	Prohibits discrimination based on disability in programs and activities receiving federal financial assistance, ensuring equal access and opportunities for individuals with disabilities.

15 U.S.C. § 7001	Grants electronic signatures and records the same legal validity as paper-based ones, ensuring electronically executed contracts are legally binding.
SOC 2 Type II	Evaluates an organization's controls over security, availability, processing integrity, confidentiality, and privacy over a defined period (typically 3-12 months), assessing both the design and operational effectiveness of these controls.
ISO 27000 Series	A family of international standards that provides best practices for establishing, implementing, maintaining, and continuously improving an Information Security Management System (ISMS) to protect organizational data and ensure security, confidentiality, and integrity.
WCAG 2.1 Level AA	A web accessibility standard that sets guidelines for making digital content perceivable, operable, understandable, and robust, ensuring accessibility for individuals with disabilities, including requirements for contrast, keyboard navigation, and screen reader compatibility.

State

Washington and OSPI's special education services—including IEP implementation—are aligned with federal IDEA requirements while also incorporating state-specific provisions. These include eligibility criteria, procedural safeguards, and district responsibilities for delivering FAPE.

The state also sets specific timelines for evaluations, IEP development, and dispute resolution to ensure timely support for students with disabilities. Additionally, OSPI emphasizes inclusionary practices, culturally responsive instruction, and compliance monitoring to uphold equity and quality standards across its districts.

Code	Description
RCW 28A.150.390	Addresses appropriations for special education programs, specifying funding mechanisms for programs operated by local school districts
RCW 28A.150.392	Discusses special education funding and safety net awards, recognizing the importance of additional funding resources for school districts serving high-need students.

RCW 28A.155	Outlines the provisions for special education services, including the identification, assessment, and provision of services to students with disabilities in public schools.
RCW 28A.230.090	Establishes graduation requirements, including provisions for students with disabilities with an IEP can access alternative pathways to meet graduation requirements in line with the IEP
RCW 28A.300.042	Requires OSPI to develop and implement a system for monitoring the performance of students with disabilities and to ensure compliance with federal and state special education requirements.
RCW 28A.300.690	Authorizes the OSPI to permit certain private entities to contract with school districts to provide special education and related services to students with disabilities.
RCW 28A.415.420	Authorizes programs to recruit, retain, and train teachers, with a focus on special education, to address teacher shortages.
RCW 28A.605	Requires the development and implementation of IEPs for students with disabilities in compliance with state and federal laws.
RCW 28A.655	Outlines education accountability system, including student assessments, school performance evaluations, and educator effectiveness to improve educational outcomes.
RCW 43.105.054	Establishes the Washington State Office of the Chief Information Officer (OCIO), outlining its responsibilities for overseeing and coordinating state government's technology operations, including IT policies and strategic planning.
WAC 180-51	Provisions for students with disabilities, such as using IEP-directed graduation pathways and modified credit requirements.
WAC 182-537-0700	Requires school districts to keep detailed records for six years to support billed school-based health services, including referrals, assessments, and IEP documentation.
WAC 392-172A	Defines state requirements for special education, ensuring districts follow IDEA by outlining who qualifies, student rights, and schools' duty to provide FAPE.
WaTech Policy #141.10	Sets rules for state agencies to keep IT systems secure, including risk checks, security plans, and following data protection laws.
WaTech Policy #143	Sets guidelines for state agencies to report and handle IT security incidents, ensuring quick response and risk control.

Section 3 Objectives

A statewide IEP system will address challenges, create opportunities for OSPI and its stakeholders, while enhancing service delivery for students and parents, educators, and administrators. The study evaluates how the system will improve student outcomes, ensure compliance with federal and state laws, prioritize data privacy and security, and facilitate statewide interoperability for seamless student transitions. We established a clear framework to assess the system's impact and to guide its future development.

Problems to be Solved & Opportunities to be Gained

Investing in a statewide IEP system offers OSPI significant advantages, directly enhancing its oversight capabilities, data-driven decision-making processes, and communication channels. These improvements, in turn, translate into more effective support for students and parents, educators, and administrator personas, ultimately strengthening the state's special education framework.

OSPI Opportunities

- **Enhanced Oversight and Compliance**
    - OSPI gains real-time data and reporting, improving oversight of special education services.
    - Consistent compliance with state and federal regulations is streamlined, reducing non-compliance risks.
    - Standardized procedures across districts will reduce compliance risks and improve equity with special education services
- **Data-Driven Policy and Resource Allocation**
    - Comprehensive data fuels informed policy decisions, optimizes resource allocation, unlocks statewide improvement opportunities, and empowers data-driven technical assistance.
    - Evidence-based practices and targeted interventions are facilitated.

    - Enhanced tracking of resources and their effectiveness.
- **Improved Governance, Communication, and Collaboration**
    - Seamless communication among OSPI, ESDs, districts, and stakeholders is enabled.
    - Timely support and guidance to districts are enhanced.

Center of Excellence

ISG recommends that OSPI establish an IEP system COE - a collaborative governance and operational team led by OSPI and responsible for delivering, managing, and continuously improving the statewide IEP system. Serving as a centralized body that represents the full spectrum of IEP stakeholders that could include members such as, but not limited to:

- Students and parents
- Educators and administrators
- LEAs and ESDs
- Union representatives
- Third-party partners and non-profit organizations

The COE's primary goal would be to foster cross-system collaboration, ensuring that education, support services, and infrastructure remain responsive to statewide IEP community needs while remaining aligned with OSPI's strategic goals and legislative mandates.

Core functions of the COE should include:

- **Coordinating Technical Support Services**
    - Centralize and coordinate technical assistance for all IEP system users statewide.
- **Delivering Training and Educational Resources**
    - Develop and maintain standardized resources to support IEP process fidelity and user proficiency across all roles.
- **Coordinating Feedback and Enhancement Requests**

- Establish structured channels for receiving feedback related to IEP processes, system configurations, and enhancement needs. Requests would be prioritized and addressed through a collaborative COE committee process.

- **Standardizing Infrastructure and Practices Across Districts**
  - Promote and support the consistent adoption of preexisting shared infrastructure, business processes, and training related to IEP implementation and compliance.
- **Acting as Liaison with the Vendor(s)**
  - Consolidate statewide feedback and represent collective community, user, and district interests in vendor roadmap planning and product development efforts.
- **Supporting Policy and Procedure Alignment**
  - Collect, collate, and analyze IEP-related data to support OSPI's governance and direction.

The COE model would serve as the foundation for a unified, responsive, and stakeholder-driven IEP system in Washington—ensuring that the voices of students & parents, educators, and administrators are not only heard but actively integrated into the system's governance and continuous improvement supporting better outcomes for students and communities.

Persona Support Improvements

- **Students and Parents**
  - Transparency to IEP information and collaborative tools via a system portal.
  - Enhanced participation in the IEP process empowering advocacy.
  - Consistent and high-quality services across districts.
  - OSPI will have better data to monitor disparity within districts to ensure equitable services for communities and improve student outcomes.
- **Educators**
  - Increased access to comprehensive student data, streamlined IEP development, and improved collaboration tools.

    - Enhanced professional development with improved access to evidence-based practices.
    - OSPI and ESDs can provide better training and materials to educators through data analysis of the system.
- **Administrators**
    - Streamlined compliance, reporting capabilities, and monitoring of student progress.
    - Enable data-driven decision-making and progress monitoring for resource allocation and program effectiveness.
    - Centralized district wide oversight and management of special education services are facilitated.
    - OSPI and ESDs can better track how districts are performing and provide support where it is needed.

Service Delivery Enhancements

A statewide IEP system will bring significant improvements to how services are delivered to students with disabilities. By creating a more consistent, efficient, and transparent process the system should help ensure that every student receives the support they need to succeed. There are several key areas that will see improvement with the introduction of a statewide IEP system:

- **Statewide District Consistency**
    - Districts will follow the same process for developing and managing IEPs, ensuring high-quality services independent of location.
    - Delivery of equitable services for all students regardless of their district.
    - Seamless access to IEP data and history will reduce delays in services, administrative burden, and ensure receiving schools are provided the full picture of the progress and service requirements.
- **Improved Communication**

    - Updates for parents, educators, and service providers can be exchanged within one system to ease adjustments to services.
    - Parents will have easier access to their child's IEP and service adjustments, providing them with an opportunity to be active advocates for their students.
- **Strengthened Policy and Governance**
    - OSPI can create clear, statewide policies that define best practices for development, implementation, and monitoring through implementation decisions and system adjustments.
    - Increased transparency can allow OSPI to provide centralized oversight to monitor compliance and ensure districts adhere to best practices.
    - A statewide system supports collaboration between parents, districts, ESDs, and OSPI to support community involvement in policy creation.
- **Data-Driven Decision Making**
    - OSPI would gain access to aggregated data helping identify needs, challenges, and areas of improvement across all districts.
    - OSPI would have access to real-time monitoring to track district performance to assist in timely adjustments to services and measure the effectiveness of IEPs.
    - OSPI would improve accountability by having transparent reporting for ESDs and LEAs to track progress and address disparities.

Response to Statutory Requirements

A statewide IEP system will strengthen special education by ensuring consistent compliance with federal and state laws and regulations while allowing flexibility for local districts. Standardized processes will help LEAs meet deadlines, streamline reporting, and reduce administrative burdens. With OSPI providing clear governance and uniform IEP management, educators can focus more on student success while minimizing compliance risks.

Compliance with Federal & State Laws

A core benefit of a statewide system is the ability to enhance compliance with federal and state special education laws. OSPI is responsible for ensuring that all LEAs meet their obligations with these regulations. The system should:

- Create consistent adherence to legal requirements, timely service delivery, and equitable implementation of special education supports.
- Heighten awareness with automated compliance monitoring, transparency to ensure districts remain on track with required evaluation timelines, IEP renewals, and progress reporting with the integration of built-in alerts and reporting functions
- Provide real-time compliance tracking offering insight into district-level trends, allowing the agency to identify risks proactively and offer targeted guidance before compliance issues escalate.

State Oversight with Local Control

As a locally controlled state, it is important for OSPI and the implemented system to strike a balance between state oversight and local district control. Districts have significant autonomy in how they manage and deliver special education services to ensure they can address the unique needs of their parents and communities. The system should:

- Provide consistency to ensure that all districts meet mandated requirements, while still allowing districts to adjust to fit local priorities and resources.
- Ensure flexibility in how districts can manage their IEP processes, enabling them to align with their community needs and specific budget, policies, procedures, and resources.
- Allow OSPI to provide governance to ensure a standards-based approach without imposing a one size fits all solution that might not work for every district.
- Empower OSPI the ability to monitor compliance and track outcomes across districts while reducing the administrative burden on LEAs.

Data Privacy & Security Compliance

Protecting student data privacy and ensuring system security are critical in the implementation of a statewide IEP system. Given the sensitive nature of student records, like medical information, disability classifications, and individualized educational supports, the system must adhere to the highest data security standards while remaining compliant with federal and state privacy laws and aligned with WaTech security standards. The system should:

- Enhance security beyond what many districts can implement independently.
- Standardize access controls, encryption protocols, and authentication measures.
- Mitigate risks associated with potentially fragmented or outdated district-level security practices and include audit trails.
- Ensure defined records retention policies.

OSPI should collaborate with district stakeholders and WaTech to ensure these policies and procedures protect student information ethically and securely. Any implementation of a future state IEP will be subject to a Security Design Review process per WaTech standards.

Statewide Interoperability & Reporting

Improving data-driven decision-making is a core principle to improve student outcomes and school performance at OSPI and aligns with mandated requirements. A statewide system supports:

- Increased tracking of student progress, monitoring the effectiveness of interventions, and identifying statewide trends in special education.
- Creates a cause and effect which empowers OSPI, educators, and policymakers to make informed decisions that support individualized learning and compliance.
- Provides visual dashboards and customized reports to track progress toward IEP goals, caseloads, and compliance monitoring helping them adjust instruction, interventions, and identify students who may need additional support with early warning indicators as needed.

- Access to analyze aggregate data trends to identify areas where additional resources, training, guidance, and/or policy adjustments are needed.
- Secure and reliable data transfer standards and protocols to enable interoperability and structured data sharing.

Transition Planning

The system should support seamless transitions for both parents and districts. It should incorporate tools to ease the administrative burden to enable comprehensive transitions from early years, district to district, out of state, and through graduation. The system should:

- Enable the secure and efficient sharing of IEP histories, reducing administrative barriers and ensuring that service continuity is maintained without disruption.
- Provide early years transitions from early intervention (Part C) to preschool education services (Part B).
- Incorporate tools for tailored assistance ensuring this vulnerable population receive continued support from DCYF to OSPI.
- Include the development and tracking of post-secondary transition goals for various pathways, such as college, vocational training, or employment, enabling educators to identify and adjust strategies to ensure every student is well-prepared for life beyond high school. This would align with the state's High School and Beyond Plan (HSBP) platform, integrating to connect IEP goals more efficiently with student outcomes in career and college readiness.

Section 4 Impacts

OSPI's primary imperative is to drive improved student outcomes, including improved instruction, through the adoption of a statewide IEP system. Delivering an enhanced educational experience to students and their parents will fundamentally alter how special education is administered, managed, and coordinated across Washington. These changes will redefine roles, expectations, and interactions between OSPI, districts, educators, service

providers, parents, and other stakeholders. Below are the key groups impacted and the specific nature of these impacts.

Students and Parents

Students and parents should experience a transformational improvement as a contributing member of the IEP team with increased transparency. The system should give students access to high quality services, best practices, and general education alignment creating more equitable access to education. While parents should have the tools needed to increase communication and collaboration with minimal delays. The following are considerations for minimizing and maximizing parent impacts:

- **Minimizing disruptions to in-progress IEP**
    - The vendor, districts, and OSPI must collaborate to ensure the student exposure to a statewide IEP implementation does not delay or hinder active IEP's.
- **New methods of progress tracking**
    - Students' educational and developmental progress will be documented and reviewed differently than before, which may alter the pace and structure of support interventions.
- **Shifts in parent engagement**
    - Parents may need to adapt to different ways of accessing student records, attending meetings, and communicating with educators.
- **Potential disruptions during transition**
    - As districts phase into the new system, some parents may experience gaps in service continuity, requiring temporary workarounds.
- **Training and support opportunities**
    - Essential for parents to have training and support to ensure effective system use and ability to advocate for their child's needs.

Educators and Student Service Providers

As the largest group of IEP system users, educators and student service providers will face significant changes to how they create, manage, and make decisions with a statewide IEP system. Beyond the technology, fundamental requirements for information, workflow steps, and timelines may change significantly depending on which prior IEP system was utilized. The following specific impacts are expected for educators and service providers:

- **Improved Instruction**
    - The standardized system will facilitate better access to comprehensive student information and resources, ultimately supporting more effective and individualized instruction.
- **New technology adoption**
    - Special education teachers and other service providers will need to adjust their daily workflows to align with the new system's interface and functionalities.
- **Changes in IEP meeting processes**
    - A more uniform IEP structure will streamline planning, documentation, and modifications, enhancing efficiency and collaboration within existing IEP meetings, though potentially adjusting local documentation flexibility. The core IEP process remains, with anticipated improvements in effectiveness and team collaboration.
- **Increased digital tracking and accountability**
    - Service providers will face stricter documentation and reporting standards, requiring more frequent system updates.

Local Education Agency

School districts will experience a significant shift in how they manage and implement IEP's. District staff will experience a shift from relatively siloed operations to being members of a statewide solution, which collaborates to drive compliance and share in best practices. The following specific impacts are expected for districts:

- **Standardized IEP workflows**
    - Districts will no longer have disparate IEP management practices, requiring a shift in internal protocols, training, and documentation.
- **Centralized data oversight**
    - Districts will have less system autonomy over IEP record-keeping, as OSPI will enforce statewide standards for access, storage, and updates.
- **Increased reliance on system training and support**
    - Staff across all districts must undergo training in system navigation, compliance tracking, and data security.
- **Integration with existing district software**
    - LEAs will need to adapt to new interoperability requirements with SIS and third-party applications.
- **Decreased cost**
    - OPSI will cover the costs of the selected IEP software, leading to a substantial decrease in expenses for LEAs.

Educational Service Districts

As regional support hubs ESDs will ensure that districts and educators receive the necessary technical guidance to transition smoothly. The implementation of a statewide system adds another layer while balancing normal operations. Specifically, the following impacts are expected:

- **Capacity and resource allocation**
    - Balancing IEP system best practices, training, and direction with existing services will require additional staffing or reallocation of resources to maintain effectiveness.
- **Training and support**
    - Provide ongoing, hands-on training for educators, school administrators, and service providers while also assisting with troubleshooting and compliance.
- **Collaboration and communication**

- Clear coordination with OSPI and LEAs is essential to align expectations, address challenges, and ensure a smooth implementation without disrupting other educational services and community needs.

OSPI

As the primary governing, funding, and operational authority for the statewide IEP program, ISG foresees that OSPI will transform from an agency which traditionally held a support and compliance role to a center of excellence that drives standardized methodology and best-practices to ESDs and LEAs. Below are the specific impacts expected for OSPI:

- **Shift from oversight to operational leadership**
  - OSPI will transition from primarily monitoring district compliance to actively shaping statewide best practices related to IEP development.
- **Expanded role in IEP system governance**
  - OSPI will manage system updates, integrations, and security, requiring new technical and administrative expertise within the agency.
- **Increased engagement with districts and stakeholders**
  - The system's centralized nature will necessitate more direct collaboration with districts, advocacy groups, and state agencies.
- **More rigorous data and compliance management**
  - OSPI will need to handle larger volumes of real-time data and ensure consistent statewide enforcement of IEP policies.
- **Potential shifts in advocacy strategies**
  - With centralized policy enforcement, advocacy groups may redirect their efforts toward state-level engagement rather than district-specific lobbying.

Third party organizations

OSPI and various districts employ third party organizations for consultancy services, technology solutions, and various special education supporting services. The following specific impacts are expected for third party organizations:

- **Vendors must align with statewide standards**
    - Educational technology providers, assistive technology developers, and contracted service agencies must adjust their systems and services to comply with OSPI's centralized framework.
- **Possible disruptions to existing vendor agreements**
    - Districts currently using third party IEP tools may need to renegotiate contracts or phase out systems that do not integrate with the new statewide platform.

Section 5 Organizational Effects

A statewide IEP implementation as currently proposed will transform OSPI from a governing body & compliance reporter that represents district-level authorities, to the major governance, funding, and operational hub for statewide IEPs in Washington. This transformation will require a significant organizational evolution.

Strategic planning

- OSPI will need to generate, maintain, and communicate a set of statewide strategies and practices related to compliant and highly effective IEP management. It will also need to generate strategies that support a statewide set of working practices that encourage districts to adopt them while continuing to operate within a district-level authority environment.

Organizational structure

- OSPI has fundamental decisions to make with regards to which governing, technical, and project resources are staffed within OSPI, and those which are provided by other state agencies, third party providers, and non-profit organizations. There are significant impacts to oversight, efficiency of operations, and cost in these decisions and ISG recommends that OSPI prioritize resource planning in a pre-implementation study.

Supporting infrastructure

- Outside of the technical infrastructure required to support the IEP system of choice, OSPI should consider the supporting systems required to manage strategic and operational functions of the statewide special education enterprise. These systems may include updating the email system so that all special-education related employees operate within a 'global-network' architecture, that project management software is available for OSPI and districts, and that OSPI coordinates with non-profit organizations for tracking & decision-making solutions related to IEP processes & systems capabilities.

Impact on Processes

Due to Washington's district-level control, the methods for delivering services to students with disabilities vary across the state. Districts currently operate with independent practices for these services, as long as they adhere to federal and state regulations. This study did not aim to document the diverse approaches used by each district.

Moving to a statewide IEP system presents intrinsic benefits such as enhanced data consistency and improved communication across the state, even if districts maintain varied local practices. However, even greater advantages could be realized if OSPI and districts could align their approaches to delivering these services, including IEPs, under a single statewide model.

Therefore, to understand how a statewide IEP system will affect current practices and to pave the way for a unified approach, it is recommended that OSPI undertake the following:

- As an initial step, catalog current practices across districts during the IEP and SIS systems inventory as part of the Pre-Implementation effort.
- Engage a third party professional services organization to analyze current versus future state practices, focusing on lean efficiencies. This team should document the impact data for each district when comparing current and future states, and also propose mitigation strategies.
- Present a proposed statewide model for IEP-related practices to district representatives through a town hall and subsequent workshops.
- Refine the statewide IEP practices model based on feedback from districts and integrate its rollout with the IEP implementation plan.
- Share the information regarding these practices, including original district feedback, with the IEP implementation training and change management teams for incorporation into their plans.

It's important to note that while IEPs are individualized to meet the unique needs of each student, a statewide system can streamline the processes involved in their development and management, potentially leading to greater efficiency and consistency while upholding procedural safeguards.

Change Management and Training Needs

Transitioning to a statewide IEP system is a significant change, and Organizational Change Management (OCM) must lead the way to ensure successful adoption and long-term impact. With a focus on preparing, supporting, and engaging people throughout the change process and addressing the emotional, behavioral, and practical aspects of shifting to a new system. It ensures that all stakeholders understand the purpose of the change, feel heard, and are equipped to navigate it with confidence. This includes clear communication, readiness

assessments, stakeholder involvement, peer champions, and continuous support to build trust and reduce resistance.

Training becomes a critical tool not just for teaching the "how," but for reinforcing the "why." Training must be accessible, role-specific, and aligned with each persona's responsibilities, technical skill level, and day-to-day realities.

When training is integrated into a broader change management strategy, it helps stakeholders feel empowered, see the benefits to their work, and understand how the new system will streamline processes and improve student outcomes.

The following topics are recommended for each audience during training sessions:

Student and Parents

- Communicating accessibility needs
- Collaborating on evaluations, IEP development, annual reviews / reevaluations
- Review progress updates
- Communication channels, learning resources

School Service Providers

- Conducting and documenting evaluations
- Tracking service delivery and therapy sessions
- Supporting the creation of IEPs with a stronger focus on instructional design and facilitate more effective progress monitoring.
- How to pull reports of timelines and compliance

Educators and Case Managers

- How to write, track, interpret, and understand IEPs in the system
- General Education alignment to IEPs
- Goal setting, progress monitoring, and reporting
- Collaboration tools with the IEP Team

- Managing amendments and reevaluations
- Identifying and tracking student needs

School Administrators & IT Staff

- Report building and process oversight
- Appropriate resource allocation and staffing needs
- Student progress oversight and intervention effectiveness
- Addressing disputes and supporting resolution process
- User account management, access controls and permissions
- Supporting technical issues and troubleshooting
- Guiding education teams in best practices and advocacy

LEAs

- Local policy and procedure configuration and customization
- Auditing proper documentation for compliance and Medicare reimbursement
- Monitoring IEP implementation and student progress reporting
- Student transfers

ESDs

- Regional training for LEAs and educators
    - Compliance both federal and state
    - Privacy and data-sharing protocols
    - Multilingual and accessibility features
    - Best practices for communication and collaboration within the system
- System troubleshooting and support
- Compliance and reporting support
- Guidance and district level technical assistance

OSPI

- Lead center of excellence forum to improve the system
- System oversight, governance, and data analytics
- Monitor district compliance and trends
- Support ESDs and LEAs in implementation and upgrades
- Policy updates and adjustments based on changes in laws and regulations, data analytics
- Advocate for equity and inclusion in system use
- Lead professional development for the rollout and ongoing enhancements of the system

Section 6 Proposed Solution

The following section focuses on the solutions that were evaluated for this feasibility study and the assessment of their suitability for OPSI's needs.

Vendors were evaluated on the following differentiators:

- **Improved Student Outcomes**
    - Aligns with OSPI goals for accessibility, transparency, and IEP performance awareness.
- **General Education Alignment**
    - Enables seamless alignment with general education standards for IEP planning and review.
- **Procurement Path**
    - Prior OSPI procurement history or presence on a Washington MSA or a NASPO contract are examples of factors that can potentially accelerate the procurement process. Other accelerators may exist.

- **Implementation**
    - Provides comprehensive resources for requirements, testing, data integration, and training, with efficient timelines.
- **Integrations**
    - Offers robust integration with diverse student information systems, including ones prevalent in Washington.
- **Support & Customer Service**
    - Delivers long-term, flexible support, efficient request handling, and proven customer care.

Considering the top three differentiators—Improved Student Outcomes, General Education Alignment, and Procurement Path—all four vendors evaluated are potentially viable for OSPI's needs, though they represent only a segment of the market. OSPI should use these vendor profiles to define key characteristics for the procurement process. Two additional criteria that were considered when evaluating vendors were:

- **Fit/Gap**: Vendor performance against OSPI-driven system requirements.
- **Costs:** A comparison of vendor licensing & implementation estimates, staffing costs, and other costs forecasted across several years.

OSPI should prioritize the profile that best aligns with its strategic goals. Additionally, the detailed vendor-specific analysis will provide further insights into other relevant criteria to inform the final selection.

Vendor Analysis

The following are evaluations of four prominent vendors in the educational technology space, each offering solutions for statewide IEP systems. This analysis will provide insights into their strengths, weaknesses, differentiators, and customer feedback, allowing for a comprehensive comparison to inform the selection process.

Public Consulting Group

In Washington since 2005. 8 of the 10 largest districts in Washington work with PCG to date. Integrations with most Washington SIS platforms and/or experience with them from other implementations

- **Total Weighted Score: 97.1**
- **7 Year Cost Estimate: $69M**

Pros from Customer References	Cons from Customer References
✓ Well-rounded complete system; has all the offerings needed to include participation and visibility for students/parents in each stage of the IEP. ✓ Customizable system to meet the needs of the individual districts as well as larger enterprise functionality when managing many districts. ✓ Different levels of support packages to fit the needs of the system and staff. ✓ Version 3.0 releases March 2025 provides a stronger user experience and enhanced **collaboration** between students, parents, and educators.	× Feels too corporate and lacks warm customer service experienced in other vendors in similar spaces. × Additional charges for technical changes are high; need strong technical lens to mitigate charges. × Current offering not too intuitive; IEP Online 3.0 looking to mitigate that.

Differentiators

- **Improved Student Outcomes:**

- Process-driven IEPs and streamlined documentation enhance IEP quality, efficiency, collaboration, data-driven decisions, and ultimately improving student outcomes.
- Parent portal streamlines document signing, accessibility to draft IEPs for review and historical data allows the opportunity and transparency for parents to contribute as active members of the IEP team.

- **General Education Alignment:**
  - Tools to map against the current General Education (GenEd) curriculum helps to ensure the students with IEPs are staying with the GenEd students without lowering the standards to keep pace.
- **Procurement Path:**
  - PCG is listed in a Department of Enterprise Services (DES) Statewide contract which may greatly expedite procurement.
- **Implementation:**
  - Streamlined implementation processes leverage existing IEP Online instances and infrastructure that enable a go live within 2-3 months.
- **Integrations:**
  - Automated data transfers with various SIS facilitating efficient data management and reducing manual entry for educators.
- **Support & Customer Service:**
  - Support packages vary to provide the right level of service; options can include quarterly on-site reviews with executive staff, weekly meetings with product leads, and a dedicated support team for prompt issue resolution.

Customers Interviewed:

North Carolina Department of Public Instruction; Lake Washington School District

PowerSchool

Started in 1997. Largest K-12 technology provider in the US, serving over 45 million students. Has a presence in all 50 states and over 90 countries. Offers a wide range of solutions, including student information systems, learning management systems, and special education management tools.

- **Total Weighted Score: 93.3**

- **7 Year Cost Estimate: $90M**

Pros from Customer References	Cons from Customer References
✓ PowerSchool offers a unified system for special education data management with consistent performance. ✓ Regular meetings with state education agency staff for feedback and improvement. ✓ Representatives are responsive to product enhancement/fix suggestions. ✓ The system can also handle peak usage times without issues, demonstrating its scalability and reliability. ✓ Experienced very little, if at all, system glitches or downtime.	× PowerSchool's quarterly update schedule can cause long waits for critical fixes and changes. × The interface is not intuitive and requires extensive training for users to learn how to use it effectively. × There is no way for parents and parents to interact with the PowerSchool system to provide feedback or collaborate on IEPs.

Differentiators

- **Improved Student Outcomes:**
  - AI-driven features that are under development, such as the individualized student learner profile and goal generator, aim to improve student outcomes by providing personalized goals and recommendations.
  - Implementation of a "Individualized Student Learner Profile" that grows with the student as goals and accommodations are created and modified allowing transparency to the IEP team and improved services for students.
- **General Education Alignment:**
  - The vendor noted that given the flexibility of the system you can setup goals to pace the GenEd curriculum. It would be a manual setup for alignment and not a specific focus for the vendor.
- **Procurement Path:**
  - PowerSchool is not on the NASPO list and does not have an existing Washington MSA.
- **Implementation:**

- Structured implementation process, including deployment planning, data migration, training, and go-live assistance, typically within an 18-month timeframe which is on the shorter side when compared with the other vendors.

- **Integrations:**
  - Supports single sign-on capabilities, data exchange with various SIS through APIs and data connectivity tools.
- **Support & Customer Service:**
  - Prioritizes long-term partnerships and customer service, offering a dedicated support team, technical account manager, and ongoing training options.

Customers Interviewed:

Alabama State Department of Education

Frontline

Started in 2003. Partners with 80,000 school districts nationwide. Supports nearly 12 million students through its special programs management suite.

- **Total Weighted Score: 80.4**
- **7 Year Cost Estimate: $53M**

Pros from Customer References	Cons from Customer References
✓ Frontline demonstrates a strong understanding of technology and implementation processes for educational programs. ✓ Willing to go above and beyond to support their clients, even if it means more work for them. ✓ Maintains open and honest communication with their clients, ensuring transparency in their dealings. ✓ Strong compliance features, allowing districts to focus on	✓ While Frontline offers customized solutions and support, smaller districts might face higher costs compared to larger districts. ✓ Frontline is responsive to customization requests; though customer might not have full control over system updates or the prioritization of feature enhancements.

documentation while the system handles compliance on the backend.	

Differentiators

- **Improved Student Outcomes:**
  - Focused on compliance and some reporting which covers students' needs technically, but other details around highlighting improved student outcomes were not addressed specifically.
- **General Education Alignment:**
  - Integrated LRE tools suggest potential for aligning IEPs with general education goals in a streamlined way.
- **Procurement Path:**
  - Frontline Education is not on the NASPO list and does not have an existing Washington MSA.
- **Implementation:**
  - Collaborative implementation process ensures a tailored solution. Actively engage with state and district stakeholders to design smooth workflows and effective adoption strategies. Have not done full-statewide implementation roll-out for their IEP but have experience in other solutions they have implemented statewide.
- **Integrations:**
  - Supports integration with various SIS systems through data exchange and API connections, facilitating data transfer and interoperability.
- **Support & Customer Service:**
  - Emphasized a responsive and collaborative partnership approach, offering ongoing support, training, and communication channels to meet the needs of the state and districts.

Customers Interviewed:

Hillsborough County Public Schools

Embrace

Started in 2003. Serves 1,100 districts across 8 states. Has a strong presence in Utah and Illinois, with over 90% of schools in those states using Embrace IEP. Manages over 264,000 active IEPs in Illinois alone.

- **Total Weighted Score: 78.1**
- **7 Year Cost Estimate: $41M**

Pros from Customer References	Cons from Customer References
✓ Dedicated customer support team with fast response times and various support channels (phone, email, live chat). ✓ Offers customization options for forms and features to meet individual district needs. ✓ Easy transfer of complete IEP meetings between districts, including all forms and documents. ✓ Intuitive interface and easy-to-use features for efficient IEP management.	× Downloading information from SIS is possible but uploading back into the SIS is not possible, manual effort. × Costing is not clear when discussing technical work being done; Embrace seems to do it case by case.

Differentiators

- **Improved Student Outcomes:**
  - Embrace has a very friendly user interface that is intuitive so that students, parents, and educators can focus on task at hand, not figuring out the nuances of the system.
- **General Education Alignment:**
  - The vendor noted that given the flexibility of the system you can setup goals to pace the GenEd curriculum. It would be a manual setup for alignment and not a specific focus for the vendor.
- **Procurement Path:**
  - Embrace is not on the NASPO list and does not have an existing Washington MSA.
- **Implementation:**

- Loose implementation guide was provided with high level talking points but when asked for specifics the topic was shifted elsewhere. Have evidence of market statewide saturation in Utah and Illinois but no evidence of full statewide rollout in those markets.

- **Integrations:**
  - While Embrace imports SIS data automatically, exporting data back is a manual process, as shown in benchmark interview, contrary to the vendor's claim of full integration.
- **Support & Customer Service:**
  - Prioritizes customer satisfaction and responsiveness offering multiple support channels while offering close collaboration during the implementation planning phase but did not provide specific details on the support/collaboration framework.

Customers Interviewed:

Issaquah School District

Benchmarking Validations

Benchmarking interviews were conducted with IEP administrators from North Carolina State, Issaquah District in Washington, Alabama, and Hillsborough County in Florida. Each IEP administrator team validated that the four IEP vendors presented in this study had satisfactorily delivered an IEP solution with requirements similar to OSPI's statewide IEP requirements. Insights and recommendations from the administrators interviewed are included throughout this feasibility study. Below is a summary of findings from the benchmarking interviews.

OSPI IEP Feasibility Study Benchmarking Summary

	North Carolina	Issaquah School District	Alabama State Department of Education	Hillsborough County Public Schools
Model	Statewide model	District-owned model	Statewide model	District-owned model
IEP Vendor	PCG	embrace	PowerSchool	Frontline Education (Medicaid)
SIS Vendor	Infinite Campus	Skyward	Schoology	Focus
Student Population	1.5M students with 200K IEPs	19,500 students; 1,873 IEPs	800,000 students; 99,000 IEPs	240,000~ students; 34,000 IEPs
Number of Districts	320 LEAs	1 District	150 LEAs	1 District
Key Insights	• Internal train-the-trainer model worked very well for statewide implementation, vendor training was less effective • Users forgot processes leading to insufficient reportable data highlighting the need for continual training from internal resources	• Great customer service when dealing with the system is important for peace of mind that they complete requests made of them • One way data flow. Skyward sends data to Embrace but the information does not flow from Embrace into Skyward, done manually currently	• A unified system has many benefits, such as an ability to monitor all districts uniformly • Emphasized the importance of training at both state and district levels to ensure they can effectively utilize the system • Team of three for Special Education Product Owner and two "coaches" (trainers/specialists)	• Vendor is found to be honest, competent, and responsive to the district's needs. They have a willingness to go the extra mile to help the district, even if it means more work for them • For parents of students with IEP: "five-day draft" policy to give parents more time to review and provide feedback on their child's IEP before it is finalized

Vendor Assessment

To succeed, an IEP vendor needs two key things: deep product knowledge and strong organizational skills for a large-scale, statewide rollout. Their IEP product must be both powerful and flexible. It needs to handle complex state requirements, adapt to changes easily, work smoothly with other systems, and allow for future updates. The vendor's team should have the right mix of strategic, operational, and technical expertise to implement the state's vision without causing delays or requiring the state to hire new staff. Finally, they must build trust by demonstrating past success and delivering on their promises. Washington's statewide IEP is a critical responsibility, and a thorough evaluation process was used to compare vendors on these important qualities.

Requirement Fit/Gap

In the requirement fit/gap portion of the vendor assessment, vendors were evaluated for their ability to demonstrate or prove their IEP solution capabilities against each OSPI requirement. All vendors are highly capable of delivering on the baseline requirements that OSPI provided. IEP Online and PowerSchool demonstrate the ability to deliver a solution with excellent accessibility, robust integrations, configurable reporting, and the near-future use of AI.

Vendors were first scored against each requirement using a Likert scale (1-5) that accounted for demonstration of the requirement and the amount of evidence provided. OSPI requirements were then prioritized by "Mandatory", "Required", and "Preferred" rankings, each of which were given a scoring weight to account for the vendor's capability alongside how critical the requirement was to OSPI.

Finally, the total requirement score for each vendor was normalized against a 100-point scale, reflecting the total weighted score above. Higher scores indicate evidence of how closely the capability meets OPSI's performance expectation and strategic intent. Lower scores indicate evidence of deficiency, or a lack of evidence to demonstrate the requirement.

Vendor Assessment – Requirement Fit/Gap Summary

Vendor	Scores by Requirement Priority			Scores by Requirement Type				Total Weighted Score 100-point scale
	Mandatory	Required	Preferred	Functional	Technical	Operational	Statutory	
IEP Online	99.58%	95.53%	100%	100%	96.02%	98.77%	100%	97.1
PowerSchool	96.03%	91.56%	93.46%	96.15%	92.49%	95.09%	95.43%	93.3
Embrace	88.62%	72.19%	64.05%	79.89%	80.57%	84.64%	82.88%	80.4
Frontline	80.98%	77.66%	60.78%	91.44%	72.61%	88.94%	45.21%	78.1

Strategic Performance Areas

In the strategic performance portion of the vendor assessment, vendors were evaluated on their probability to perform against each strategic performance area. Evidence was collected from benchmarking interviews, vendor interviews, vendor-submitted documentation, and publicly available information. IEP Online and PowerSchool demonstrate significant competency in strategic performance, along with evidence of other successful major implementations.

Embrace and Frontline demonstrate that they are both capable of delivering a statewide IEP implementation, but that OSPI may need to supplement capabilities or mitigate risks with additional governance and staffing.

A high score indicates evidence of competency and prior demonstrated experience in the strategic performance area. A medium score indicates that the vendor can satisfy the baseline performance required for a statewide implementation. A low score indicates that OSPI may need to supplement the vendor in the strategic area to mitigate potential risk.

Vendor Assessment – Strategic Performance Areas Summary

Vendor	Improved Student Outcomes	General Education Alignment	Procurement Path	Implementation	Integrations	Support & Customer Service
IEP Online	High	High	Medium	Medium	Medium	Medium
PowerSchool	High	High	Medium	Medium	High	High
Embrace	Medium	Medium	Medium	Low	Medium	High
Frontline	Medium	Medium	Medium	Medium	High	Medium

Vendor Assessment Summary

This evaluation demonstrated that as OSPI moves towards issuing a Request for Proposal (RFP), there are significant differentiators between vendors in terms of their ability to meet OSPI's requirements.

- **Performance Against Requirements**: Vendors vary in their ability to align with OSPI's technical, functional, and compliance standards for a statewide IEP system.
- **Costing**: There are notable differences in total cost of ownership, including implementation costs, licensing fees, ongoing maintenance, and support costs.
- **Implementation Timeline**: Vendors propose differing deployment timelines, with some offering faster implementation at potentially higher costs or requiring additional resources.
- **Strategic Performance Capabilities**: Vendors differ in scalability, interoperability with existing state systems, long-term sustainability, and future roadmap alignment with OSPI's vision.
- **Currently Supported Districts**: Some vendors have a strong presence in other states or districts, providing valuable insights into potential risks, implementation challenges, and best practices.

Table: Vendor Assessment Summary

Vendor	7-Year Cost	Implementation Timeline	Requirements Score	Strategic Performance	WA Districts Currently Supported
IEP Online	$69M	12-18 months	97.1%	Medium	259
PowerSchool	$90M	18 months	93.3%	High	4
Embrace	$53M	12-16 months	80.4%	Medium	30
Frontline	$41M	24 months (to pilot)	78.1%	Medium	1

Section 7 Major Alternatives Considered

While the initial market scan revealed several vendors whose solutions did not meet the current statewide IEP system requirements, they were noted for potential future alignment, contingent upon specification changes.

Not Compatible Vendors

- **Infinite Campus**: The IEP solution is bundled with their SIS offering and cannot be separated to stand alone. Should OSPI decide to pursue a statewide SIS platform coupled with a statewide IEP platform, this vendor would be worth re-engaging during a formal procurement process.
- **Special Education Automated Software (SEAS):** Declined to participate as they felt as though their solution was missing some of the components requested and, while on the roadmap, not available in their program at this time.

Vendors that Declined to Participate

- **e-IEP Pro:** Declined participation.
- **Edupoint:** Declined to participate upon learning that cost information and implementation strategy were going to be requested. Edupoint said they would be interested in participating in the RFP stage but not during the feasibility study. A customer reference

was provided in which the interview was conducted and insights from the customer's perspective were captured.

Edupoint Customer Reference: Beaverton School District	
Pros from Customer References	**Cons from Customer References**
✓ The system includes a dedicated state reporting module that ensures compliance with state-specific requirements and simplifies the reporting process for districts. ✓ Dedicated module streamlines state reporting for districts. ✓ User-friendly portal provides parents with access to grades, attendance, and other important updates, promoting engagement in their student's education.	× The district uses Canvas as its Learning Management System (LMS), and the integration with Edupoint is problematic, requiring manual updates and lacking full data transfer. × While the parent portal is robust, it currently doesn't support IEP documents. × Edupoint itself doesn't train parents; this falls to the district. × The system can be complex to learn and navigate, particularly for staff members who are not tech-savvy.

Section 8 Conformity with Agency IT Portfolio

OSPI's Information Technology Vision is to, "Partner with OSPI programs and leadership to align business strategies and capabilities with agile and modern technological solutions, enhancing capabilities and enabling responsive, data-driven decision-making." OSPI understands it's imperative to manage the data infrastructure that delivers data for all data collections, technical spends, Data Structures & Algorithms (DSAs), and educational technology advocacy, and oversight.

The statewide IEP initiative aligns with OSPI Agency Supporting Goal #4: "A Committed, Unified, and Customer-Focused OSPI":

- "Support school districts through consistent, timely, and meaningful funding and supports that center the needs of students. Agency operations are unified in facilitating services and resources in alignment with the commitments in our strategic goals."

OSPI Information Technology Service Goals

- Deliver prompt and effective business, information, and technology services in collaboration with OSPI program areas to enable program and district capabilities to serve every student.
- Deliver modern, secure, and supportable business and data solutions.
- Deliver business and financial value through efficiencies that optimize our Information and technology with practical solutions.
- Deliver highly available information and technology solutions that keep our programs analyzing data and reporting information that facilitates funding and resources.
- Develop staff knowledge, skills, and abilities to analyze, build, automate, and support modern information and technology.

Through the lens of OSPI's strategic intent and service goals, the study identified several critical themes related to the technical aspects of a successful statewide IEP implementation. It is important to note that following this feasibility study, OSPI is engaging in a data modernization feasibility study that includes a discovery effort of OSPI's technical systems and data capabilities. While the findings and recommendations are not exhaustive, the study recommends that OSPI source this section for the data modernization feasibility study and in scoping efforts during the pre-implementation phase of the IEP.

Data Integration

The following recommendations align to OSPI IT Service Goals 1, 2, 4, and 5:

- **SIS as the Critical Integration**
    - The integration with each district's SIS is critical for project success. There are a variety of SIS being utilized across the state, and it is understood that there will not be a mandate for districts to move to a singular SIS prior to the statewide IEP

implementation. For this reason, additional resourcing is necessary to support the variety of SIS implementations.

- **OSPI Data Team Capacity**
    - The current OSPI data team may lack the tooling and staffing for required statewide integrations. Vendor capabilities in this area vary and have been a challenge in past implementations. ISG recommends that OSPI employ third party organizations that are experienced in large-scale enterprise data migrations to supplement the OSPI and vendor staff.
- **SIS and IEP System Integration**
    - Due to usage in both SIS and IEP systems for different reporting & records management tasks, the integration between SIS and IEP systems needs to be bidirectional, meaning that data must flow from IEP to SIS, and from SIS to IEP.
- **Integration Approaches**
    - There are two primary integration approaches widely utilized between systems, and it is a likely scenario that both will be employed to account for the statewide inventory of SIS and other information systems into the IEP.
        - **Batch Processing:** Data movement between systems via file exports/imports (daily or more frequent). This can be cumbersome for OSPI due to multiple SIS systems integrating with one IEP system. WSIPC currently supports these integrations.
        - **APIs:** Using APIs for integration between IEP and SIS. The availability of API support from existing SIS vendors is unknown. PowerSchool provides an API for data extraction from its IEP system, and PowerSchool has a proprietary data integration tool whose capabilities should be explored if OSPI selects them as the IEP vendor.

- **Tooling and Staffing**
    - The current OSPI data team's tooling is insufficient for this project's scale. Investment in modern data integration tools is needed if OSPI chooses to manage integrations. Otherwise, OSPI must rely heavily on third party organizations to staff and support the statewide dataset. Regardless of the data host, additional staffing for the OSPI data team will likely be required. This recommendation is reflected in the staffing model section of the Cost Benefit Analysis (CBA).
- **Other Potential Integrations**
    - The following integrations are not critical to achieve a Minimum Viable Product (MVP) of the statewide IEP but would greatly benefit the user community supporting all Special Education requirements.
        - **DCYF:** Integration with DCYF to capture records for children ages 0-3.
        - **Medical Billing:** Clarification is needed on how medical billing will be handled and whether integration with a Washington Health Care Authority (HCA) system will be required (and if it's part of the MVP).
        - **Data Warehouse:** Integration between the IEP system and a data warehouse environment should be considered for future enhancements. Existing data warehouse capabilities were not explored in the feasibility study.

Information Security

The following recommendations align to OSPI IT Service Goals 2 and 4:

- **Critical Focus**
    - Authentication is the most critical information security area, considering the vast user community that will be accessing the statewide IEP.

- **Current Approach Risk**
    - The current password-based access approach without multi-factor authentication (MFA) poses a significant risk.
- **Preferred Approaches**
    - Microsoft Active Directory (Entra ID) with MFA is the current best practice. Feasibility for this project needs to be assessed, considering that district employees are not state employees. Secure Access Washington (SAW) authentication with MFA is an alternative option. Both alternatives would provide secure authentication, including MFA.

Data Migration

The following recommendations align to OSPI IT Service Goals 1, 3, and 5.

- **Requirement**
    - A requirement should clarify whether all historical IEP cases or only active cases should be migrated to the new system. ISG recommends that OSPI direct all active IEP cases from all current IEP systems to the statewide IEP.
- **Responsibility**
    - The most straightforward data migration approach is for the IEP vendor to migrate all required IEP data from existing IEP systems to the new system. If the IEP vendor cannot perform the migration, OSPI will likely need to hire additional resources or contract with a data migration specialist as current OSPI staffing and tooling are insufficient to perform this work.

Staffing

The following recommendations align to OSPI IT Service Goals 1, 3, and 5.

- **OSPI's Role**
    - ISG recommends that OSPI host the top-level system administrator role for the statewide IEP system.
- **Recommended OSPI Technical Staffing**
    - OSPI will need a system engineer to manage the system and interact with the IEP vendor. The OSPI engineer would delegate administrative control to district system engineers for district-level configurations that differ from state-level configurations. The availability of district-level engineering resources is unclear and may need to be supported by third party organizations. Staff will also be needed to manage and maintain data integrations, which could be contracted out to third party organizations. These staffing recommendations are reflected in the staffing model section of the CBA.

Governance

The following recommendations align to OSPI IT Service Goals 1, 3, and 4.

- **Benchmarking Models**
    - Other state models that have had success in implementing statewide IEPs can be a model for the IEP project's governance. This includes setting a budget for enhancements and prioritizing and building requirements for those enhancements to be given to the vendor. ISG recommends that OSPI reviews WSIPC's collaboration with ESDs and other state governance models to create an OSPI driven governance model.
- **Partnership**
    - The project will require a partnership between OSPI, WSIPC, districts, and ESDs for success, as these are the state's current state critical stakeholders for the IEP program.

- **Governance Framework**
    - A governance structure will support strategic planning, IEP roadmaps, and vendor management in a collaborative fashion.

Other Technical Considerations

The following recommendations align to OSPI IT Service Goals 2, 3, 4, and 5.

- **Critical Systems and Systems Architecture**
    - Understanding the technical staff's capabilities and exploring systems architecture that will support a statewide enterprise program are critical to properly scope resources and considerations for the implementation effort. ISG recommends that OSPI's Data Modernization Study and the Pre-Implementation phase of the statewide IEP prioritize a discovery effort for systems architecture.
- **General Implementation Perspective**
    - While vendors will have preferred implementation approaches, ISG recommends a phased, district-by-district implementation approach for the statewide IEP effort. A "big bang" approach, where every district simultaneously conducts go-live with the IEP system should be avoided.

Ultimately, the implementation velocity will depend on the size of implementation teams. Districts may have a limited ability to be successful without additional expertise, so ISG recommends the staffing approach outlined in the CBA, where project & technical resources are provided by third party organizations and the vendor team. OSPI should expect that the IEP vendor will need support from OSPI/ESD network engineering, authentication, security, and data management roles.

Section 9 Project Management and Organization

The overall project success of implementation and maintenance of the Statewide IEP platform relies heavily on a structured and well-defined project management approach. This section outlines recommendations for the project management strategy to be employed to ensure the project meets its objectives effectively and efficiently. Key aspects covered include recommendations for the project team organizational structure and the core team members roles and responsibilities, the decision-making process, management qualifications, and quality assurance strategies.

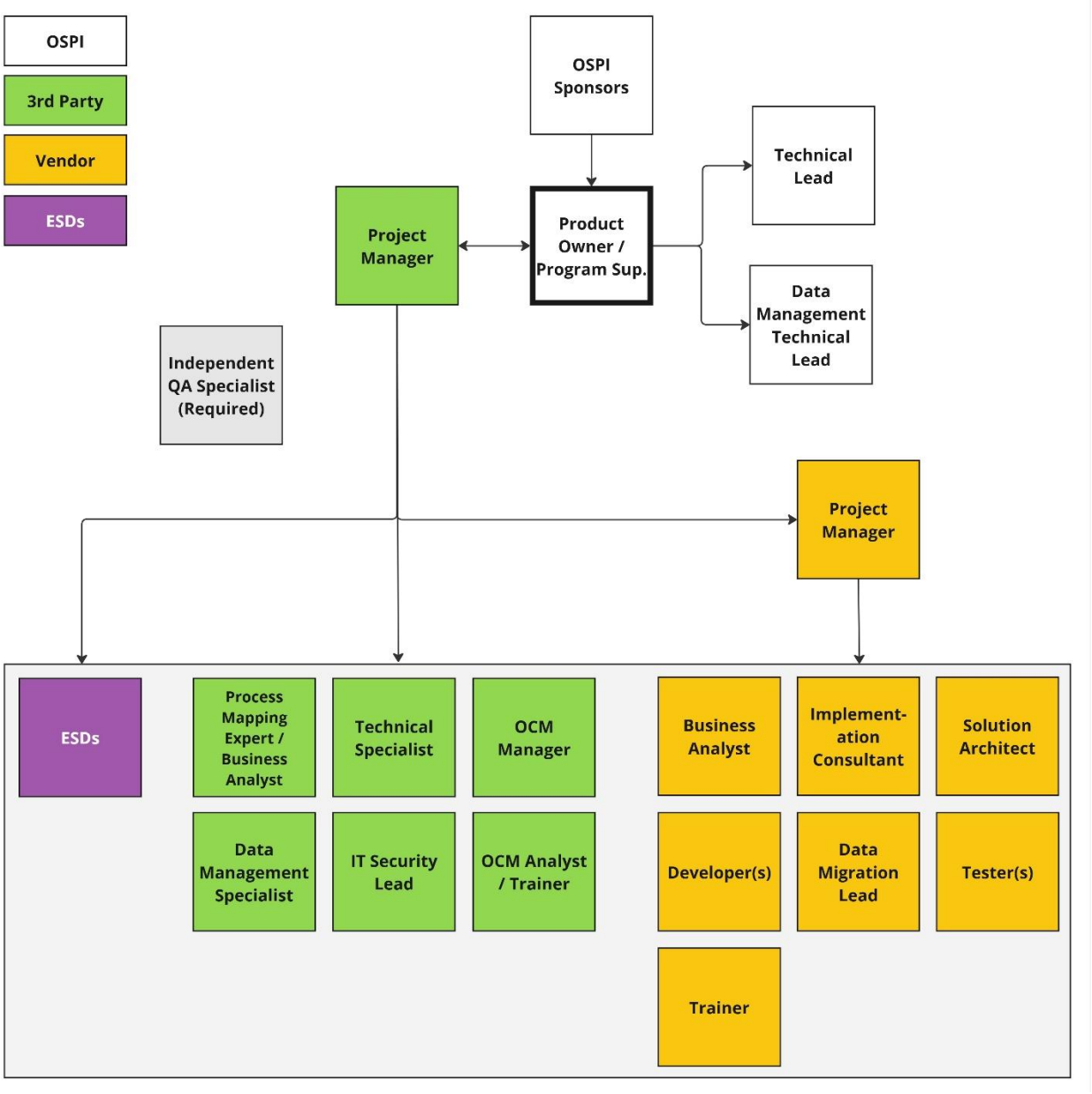
Project Management Approach

The proposed staffing model considers both implementation and sustainment phases of the statewide IEP effort. However, to effectively navigate the complexities of implementation, certain roles and responsibilities will be refined. Resource allocation will be flexible, contingent on several factors: OSPI team capacity, the chosen vendor's capabilities, and the strategic use of third party organizations to fill any resource gaps. Given the Business and Technology Sponsors' decision to use a vendor solution potentially supplemented by third party organizations, the Implementation Team's structure and roles were designed to align with this approach.

The recommended project resources identified below are accounted for in Section 11, Cost Benefit Analysis.

ISG recommends that OSPI staff and implementation team comprised of OSPI employees, experienced consultants, and the chosen Vendor's Professional Services team.

The recommended project team organizational structure is pictured below:



Roles and Responsibilities

The successful implementation of the project will require participants to have a clear definition and understanding of roles and responsibilities. Note that some of the roles listed in the proposed Project Team are combined to show where a single full-time equivalent (FTE) can fill multiple project roles. Several key assumptions drive the recommended staffing model:

- OSPI will serve as the principal monetary, strategic, operational, and technical decision-maker for the statewide IEP implementation. All other parties involved report to OSPI and support OSPI's directives.
- Representatives from project management, technical, data management, and IT security are required. This ensures effective delegation and maintains proper operational authority for their respective organizations.
- The chosen IEP vendor provides the hosting infrastructure, including data and information security capabilities.
- The vendor will conduct the initial training, OSPI Strategy will manage all supplemental and continuous training, leveraging resources and input from third party organizations as needed.

Below is a list of recommended roles and responsibilities for the implementation team:

Recommended Staffing Model for OSPI Statewide IEP Implementation

	Role	Responsibilities
Executives	Executive Sponsor (OSPI)	• Strategic oversight • Agency commitment fulfillment • Final decisions affecting scope, schedule, budget • Determines risk acceptance
	Business Sponsor (OSPI)	• Agency commitment fulfillment • Strategic business oversight • Business objectives achieved • Accepts project deliverables
	Technology Sponsor (OSPI)	• Agency commitment fulfillment • Strategic technology project oversight • Business objectives achieved • Accept project deliverables

Project Management	Product Owner/ Special Education Program Supervisor (OSPI)	• Principal OSPI representative and chief executive of the statewide IEP implementation • Leads the training and change management strategy • Directs strategy, approves planning, execution, and funding related to the project • Manages OSPI staffing resources
	Project Manager (Third Party Organization)	• Principal third party organization representative and manages third party organization staffing resources
	Process Mapping Expert (Third Party Organization)	• Current state process mapping to inform implementation strategy • Future state process mapping to inform maintenance & operations strategy
Change Management	Change Manager (Third Party Organizations)	• Partners with training team during implementation • Catalogs policy, business process, and technology changes • Manages change management strategy • Mitigates change risk with change artifacts & activities blended into the training plan
	Change Management Analyst / Trainer (Third Party Organization)	• Embeds with training team during implementation • Executes the change management strategy through change artifacts & activities during training sessions
Technical	Technical Lead (OSPI)	• Lead for OSPI technical staff • Communicates OSPI technical capabilities & requirements • Manages technical decisions for OSPI with appropriate approval
	Technical Specialist (Third Party Organization)	• Lead for third party organization technical staff • Communicates third party organization technical capabilities & requirements • Manages technical decisions for third party organization with appropriate approval

Data	Data Management Lead (OSPI)	• Lead for OSPI data staff • Communicates OSPI data capabilities & requirements • Manages data decisions for OSPI with appropriate approval
	Data Management Specialist (Third Party Organization)	• Lead for third party organization data staff • Communicates third party organization data capabilities & requirements • Manages data decisions for third party organization with appropriate approval
IT	IT Security Lead (OSPI)	• Leads OSPI IT Security staff • Communicates OSPI IT Security capabilities & requirements • Manages IT Security decisions for OSPI with appropriate approval
QA	Independent QA Specialist (Third Party Organization)	• Required by WaTech standards during the implementation • Conducts an independent QA of implementation effort against WaTech standards
Vendor	Project Manager (Vendor)	• Principal vendor representative and manages vendor staffing resources
	Business Analyst (Vendor)	• Primary assistant to the vendor project manager • Assists with scheduling, coordination, and deliverables creation
	Implementation Consultant (Vendor)	• Subject Matter Expert (SME) for implementation best-practices from the vendor's perspective • Represents vendor strategic & business process needs
	Solution Architect (Vendor)	• Lead for vendor technical staff • Communicates vendor technical capabilities & requirements • Manages technical decisions for vendor with appropriate approval

	Developer (Vendor)	• Lead for vendor development staff • Coordinates with OSPI & LEA technical team to determine configurations & customizations • Determines & communicates scope and schedule for development requests for implementation decisions
	Data Migration Lead (Vendor)	• Lead for vendor data requirements • Coordinates with other data teams to determine scope, variety, magnitude, and order of necessary data migrations • Executes on the agreed-upon data migration strategy and reports progress
	Tester (Vendor)	• Lead for vendor testing & validation processes • Prominently involved during User Acceptance Testing portion of the implementation • Acts as internal Quality Assurance (QA) for any configurations & enhancements needed beyond original product offering
	Trainer (Vendor)	• Lead for vendor training efforts • Coordinates closely with other party training & change management resources • Leads the agreed-upon training portion of the implementation strategy • Responsible for communicating training progress and follow-on needs

Decision-Making Process

Making timely and lasting project decisions is crucial for driving the project's momentum and determining its overall effectiveness. To ensure these key decisions are well-documented and efficiently facilitated, the Project Manager should leverage project management tools, artifacts, and best practices. This approach will maintain transparency, accountability, and alignment with the project goals.

Project Charter

- The Project Charter defines the key objectives, scope, budget, and schedule of the project, serving as a foundational document. It aligns stakeholders, clarifies what is in

and out of scope, and ensures transparent decision-making. Objectives require input from the project team and final approval from business and IT sponsors. The Charter is critical for guiding project decisions, managing scope, controlling budget, and ensuring clear communication throughout the project lifecycle.

Project Schedule

- The Project Schedule is a vital tool that outlines the project timeline and supports the decision-making process. Developed with input from the vendor (and/or Systems Integration Team), the recommended project team, and under the expert oversight of the Project Manager, the schedule identifies dependencies and sets key Executive Milestones. This high-level schedule ensures stakeholder alignment, highlights critical decision points, and keeps the project on track by documenting key decisions collaboratively.

Project Management Plan

- The Project Management Plan (PMP) outlines how the project will be managed, ensuring clear accountability and oversight. It establishes a governance framework, defines roles and responsibilities, and details processes to drive efficient decision-making and effective project execution.
    - **Governance Framework:** An effective governance framework is critical to providing strategic direction, achieving objectives, managing risks, and ensuring resource stewardship. The framework should clearly define roles, responsibilities, and decision-making authority, with all team members trained in their roles and responsibilities and escalation processes. The recommended governance framework consists of three key groups:
        - **Executive Steering Committee (ESC):** Sets strategic direction, manages project scope, schedule, and budget, and resolves escalated issues. The Executive Sponsor, as part of the ESC, holds ultimate decision-making authority, but can delegate when needed.

        - **Project Manager:** The primary point of contact for status, priorities, and governance, responsible for day-to-day decision-making and escalating critical issues to the Steering Committee.
        - **Project Liaison Team:** This core working team represents all stakeholder groups, including Cyber System Security and Enterprise Architecture. This team minimizes delays by addressing issues quickly but can escalate decisions when there is significant business impact or political sensitivity.
- Key decision-making processes that should be included in the PMP are:
    - **Risk-Issue-Action-Decision (RAID) Log Management**
        - The PMP should detail the process for managing risks, issues, actions, and decisions throughout the project. For instance, risks will be assessed during weekly project team meetings to determine appropriate mitigation strategies. If a risk escalates into a significant issue, it will be referred to the Business and IT Sponsors for approval of the proposed mitigation approach. This structured approach ensures timely and effective management of project risks and issues.
    - **Schedule Decisions**
        - The PMP should outline how the team will escalate any schedule changes that impact Executive Milestones.
    - **Budget Decisions**
        - The PMP should outline how the team will escalate any budget decisions throughout the project team.
    - **Scope Decisions**
        - The PMP should outline how proposed modifications to scope will be documented and circulated through the project team for review and approval.

Management Qualifications

The selected Project Manager should be trained in leading Project Management Body of Knowledge practices to effectively support implementation and maintenance of the Statewide IEP System. The IT professionals should be talented in their respective fields. Business representatives should be able to confidently articulate their operational needs to the Vendor team and/or the Systems Integration team.

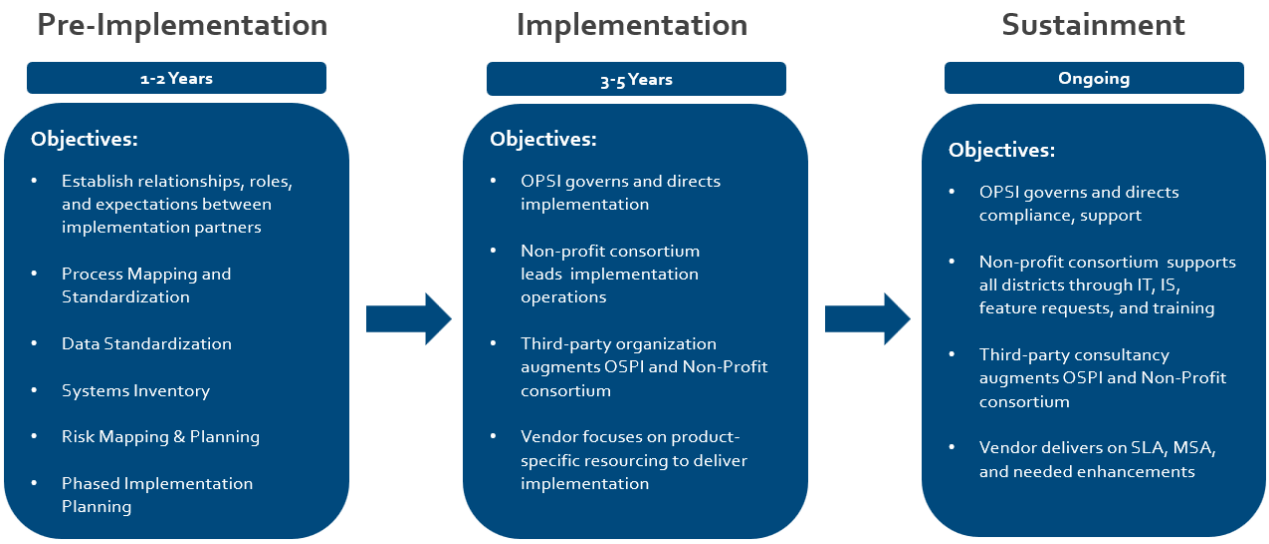
Quality Assurance Strategies

Working cooperatively and transparently, the OSPI Project Manager (in a lead capacity) and the other Project Managers will ensure the Project Sponsor and Steering Committee always have a full and accurate view of the project's progress, success, and needs.

Expectations, deliverables and expected activities should be clearly defined and discussed during the contracting process. With an Agile delivery model, frequent system demonstrations will assist the agency in confirming alignment to expectations early in the process. OSPI staff should be actively involved in the testing process to validate functionality and system behavior. Due to the level of investment and risk associated with this project, WaTech requires external Quality Assurance (QA) to provide an independent assessment of the project.

Section 10 Estimated Timeframe and Work Plan

ISG recommends that OSPI phase its statewide IEP effort into three primary efforts: Pre-Implementation, Implementation, and Sustainment. From the beginning of pre-implementation efforts to sustainment, this study anticipates a timeline of 4-7 years.



Since 2023, publicly funded projects implemented in Washington departments are required to deliver on an Agile [3]model. Section 701 outlines the special appropriations language for the current operations budget (ESSB 5187), and requires:

- Agile development methodology with a live system demonstration every two weeks
- Product deployment is due within 180 days of a signed contract
- Key project functions deemed critical must be retained by state personnel and cannot be outsourced

Given the Section 701 mandate, project stakeholders are expected to align and deliver from rapid development cycles. The 180-day deployment timeline will require early and continuous engagement from functional users, dedicated testers, and technical teams to validate functionality in real-time. ISG recommends that OSPI negotiate delivery terms during procurement efforts that align to Section 701 requirements while also allowing for a sustainable, phased rollout across districts.

[3] Agile Methodology

Pre-Implementation Phase

This phase is critical for OSPI to establish a strong foundation for the project. ISG recommends that OSPI conduct a formal IPS to conduct the activities below with support of a third party. OSPI should expect that the vendor is minimally engaged at this point in the project, since funds are not allocated for vendor involvement until the Implementation phase.

Pre-Implementation Priorities

- **OSPI Implementation Team Formation**
    - Define clear roles and responsibilities within OSPI, including project management, technical, and functional expertise.
- **Internal Stakeholder Engagement Strategy**
    - Develop a comprehensive stakeholder engagement plan, including communication strategies for school districts, special education directors, and parents.
- **Funding & Resource Allocation**
    - Finalize budget estimates for staffing, infrastructure contingency, and direct-to-vendor costs

Implementation Phase

During the Implementation Phase, OSPI will partner with other agencies to strategize, design, and deliver the statewide IEP to every Washington district that chooses to participate. While work planning phases will ultimately be negotiated between OSPI and the selected IEP vendor, the following efforts should be prioritized into scope.

Implementation Priorities

- **Requirements Validation**
    - Review detailed requirements with the vendor providing technical expertise and guidance.

- **Security, Data Migration, and Governance Planning**
    - Ensure accessibility and security requirements are met, with the vendor providing technical solutions.
    - Develop a detailed data migration plan, with OSPI taking a lead role in data cleansing and validation.
    - Define the post-implementation governance structure
- **System Configuration and Customization, and Integrations**
    - Configure the system based on the agreed-upon requirements, then develop and test integrations with existing OSPI and district systems.
- **Data Migration and Testing**
    - Execute the data migration plan, with OSPI conducting thorough data validation.
- **User Acceptance Testing (UAT)**
    - Conduct UAT with district representatives, gathering feedback and identifying issues.
- **System Go-Live**
    - Each district will go-live with the statewide IEP on the pre-determined go-live date

Sustainment Phase

During the sustainment phase of the effort, all participating districts will be fully implemented to the statewide IEP and OSPI will lead a supporting effort to respond to technical, functional, statutory, and policy needs from across the state. Through sustainment, ISG recommends the following recurring efforts.

Sustainment Priorities

- **System Performance Monitoring**
    - Create real-time system performance tracking to monitor stability and reliability, aligning with the vendor's Service Level Agreement (SLA)
- **Collect Stakeholder & User Feedback**

    - Develop a structured feedback loop with districts, educators, and parents
- **Best Practices, Training, and Development**
    - Maintain a centralized training repository with vendor materials and Washington program materials.
    - Offer quarterly and annual training refreshers on IEP best practices and system updates
- **System Roadmap Management**
    - Maintain a rolling 12–24-month system enhancement roadmap with the vendor to align with district demands
- **Quarterly Business Reviews (QBR's)**
    - Conduct QBR's with the vendor to evaluate items such as system performance, incident resolution metrics, user rates, and training feedback

Section 11 Cost Benefit Analysis

The Cost Benefit Analysis provides costs for the viable alternatives referenced in Section 6, Proposed Solution. For each alternative, costs are provided for software licensing, implementation fees, staffing, and other estimated expenditures.

A summary of the estimated costs is provided below. The summary addresses non-recurring costs for the Implementation phase, as well as recurring annual cost estimates for Maintenance & Operations. The scope of this Cost Benefit Analysis is 7-years per WaTech guidelines. OSPI expects to complete a 5-year statewide implementation, with the first three years serving to implement most districts and years 4-5 reserved for sustainment operations. Years 6-7 of the analysis reflect a fully implemented and stabilized statewide IEP operation.

Staffing Model

The staffing model proposed accounts for a simultaneous demand to support implementation across districts while also supporting business-as-usual operations and those districts already implemented across the state. Except for mandated quality assurance resources during

implementation, the same staff which support the statewide IEP implementation are expected to be retained for maintenance & operations. The robustness of this staffing scenario accounts for a significant portion of the total cost model, regardless of the IEP vendor chosen.

Dedicated FTE from within OSPI, and professional services from third parties agencies to lead discovery, design, and build efforts account for most staffing costs. This estimate also includes costs for resources which direct technical architecture, systems integrations, data migration, and information security efforts. Change management and training efforts are assumed to be owned by full-time change management staff from third-party resources, in partnership with the vendor training team.

Over time, OSPI may choose to replace third-party resources with FTE hires, potentially decreasing the total labor costs while investing in its FTE to create long-term relationships and operational wisdom between its office and the educational districts. A single labor model is presented in which the resource hosts (OSPI, third party organization) can be interchanged.

In the first years of the statewide IEP project, implementation is expected to account for most of the staffing labor, while maintenance & operations costs are expected to begin much lower and slowly increase each year as more districts are implemented. The CBA accounts for this by allocating labor between implementation and M&O each year using the following model:

Implementation vs. M&O Staffing Allocation

	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7
% Implementation / Recurring	90/10	70/30	50/50	30/70	10/90	0/100	0/100

The projected staffing costs are broken out in the table below. Project management, technical, data, and IT security services are expected to account for a large portion of staffing costs. Funding sources for these roles should be seen as flexible and are recommended to be negotiated once OSPI has concluded an IPS to better determine scope and capabilities of the parties involved.

Projected Staffing Costs by Resource Category

Projected Staffing Costs – Washington Statewide IEP								
Staff Category	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Subtotals
% Implementation / Recurring	90/10	70/30	50/50	30/70	10/90	0/100	0/100	
Executive Sponsorship	$29.9K	$29.9K	$29.9K	$29.9K	$29.9K	$29.9K	$29.9K	$209.3K
Project Management	$806.4K	$806.4K	$806.4K	$806.4K	$806.4K	$806.4K	$806.4K	$5.6M
Product Management	$132.1K	$132.1K	$132.1K	$132.1K	$132.1K	$132.1K	$132.1K	$924.5K
Change Management	$672	$672K	$672K	$672K	$672K	$672K	$672K	$4.7M
Technical Services	$420.1K	$420.1K	$420.1K	$420.1K	$420.1K	$420.1K	$420.1K	$2.9M
Data Management	$420.5K	$420.5K	$420.5K	$420.5K	$420.5K	$420.5K	$420.5K	$2.9M
IT Security	$384K	$384K	$384K	$384K	$384K	$384K	$384K	$2.7M
Quality Assurance	$355.2K	$355.2K	$355.2K	$355.2K	$355.2K	-	-	$1.8M
Annual Staff Totals	**$3.2M**	**$3.2M**	**$3.2M**	**$3.2M**	**$3.2M**	**$2.9M**	**$2.9M**	
Total 7 Year Staffing Cost: $21.8M								

Below is a summary of the total projected staffing cost for 7 years, organized by the key resource contributors to the statewide IEP effort.

Projected Staffing Costs by Key Resource Contributors

Projected Staffing Costs – Washington Statewide IEP								
Staff Category	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Subtotals
% Implementation / Recurring	90/10	70/30	50/50	30/70	10/90	0/100	0/100	
OSPI	$810.5K	$810.5K	$810.5K	$810.5K	$810.5K	$810.5K	$810.5K	**$5.7M**
External Party*	$2.4M	$2.4M	$2.4M	$2.4M	$2.4M	$2.1M	$2.1M	**$16.2M**
Vendor	Vendor staffing included in implementation & license fees.							
Annual Staff Totals	**$3.2M**	**$3.2M**	**$3.2M**	**$3.2M**	**$3.2M**	**$2.9M**	**$2.9M**	
Total 7 Year Staffing Cost: $21.8M								

Non-Recurring Implementation Costs

Implementation costs reflect a 5-year implementation timeline. Costs are significant during this period due to the need for a simultaneous rollout of multiple districts at a time across Washington, and the goal to accomplish 90% of the statewide rollout by the end of year three. Vendors submitted their implementation fee estimates as a cost range, and the median cost of each vendor's range is reflected in the study.

Budgets for planning and procurement efforts are accounted for in this analysis, as ISG recommends that OSPI conduct an IPS and supplement its staff to assist with the complex purchasing phase of the effort.

Summary of Non-Recurring Implementation Costs

Non-Recurring Implementation Costs – Washington Statewide IEP				
Cost Category	PCG	PowerSchool	Frontline	Embrace
Implementation Fees	$2M	$12M	$6.8M	$1M
Salary & Wages	$8.1M	$8.1M	$8.1M	$8.1M
Planning	$150K	$150K	$150K	$150K
Procurement	$400K**	$400K	$400K	$400K
Total Implementation Costs	**$10.6M**	**$20.6M**	**$15.4M**	**$9.6M**

Recurring Maintenance & Operations Costs

Each vendor's quoted licensing fee generally includes systems integration, data migration, SLA-based customer support, maintenance support, data management services, and basic training services. Like implementation fee estimates, vendors submitted their licensing fee estimates as a cost range, and the median cost of each vendor's range is reflected in the study.

A 5% annual increase was applied to each alternative vendor's license fee to account for inflation and increased vendor support.

Enhancements are expected each year as more users are involved in the statewide IEP system and demand grows to enhance the system to align with evolving statewide special education standards. An enhancements fee set to 5% of the annual license fee was applied to each alternative vendor.

Summary of Recurring Maintenance & Operations Costs

Recurring Maintenance & Operations Costs – Washington Statewide IEP				
Cost Category	PCG	PowerSchool	Frontline	Embrace
License Fees	$42.7M	$52.9M	$22.4M	$17.1M
Salary & Wages	$13.8M	$13.8M	$13.8M	$13.8M
Enhancements	$2.1M	$2.6M	$1.1M	$857K
Total M&O Costs	**$58.7M**	**$69.3M**	**$37.3M**	**$31.8M**

Summary Costs

Total 7-year cost estimates for each vendor option range from $53M to $90M including implementation, maintenance & operations, the staffing to support those phases, and assumed annual increases. The associated fully loaded cost per IEP in Washington is also included for each vendor.

7-Year Costs Summary (Implementation + Maintenance & Operations)

Cost Category	PCG	PowerSchool	Frontline	Embrace
Implementation	$10.6M	$20.6M	$15.4M	$9.6M
Maintenance & Operations	$58.7M	$69.3M	$37.3M	$31.8M
7 Year Totals	**$69.3M**	**$89.9M**	**$52.7M**	**$41.4M**
$/IEP over 7 Years	**$65.96**	**$85.60**	**$50.18**	**$39.41**

To account for Washington's biennium budgetary planning cycle, below are the estimated 2-year cost totals for each IEP vendor option.

Years One and Two Costs Summary (Implementation + Maintenance & Operations)

Cost Category	PCG	PowerSchool	Frontline	Embrace
Implementation	$7M	$12.7M	$6.9M	$6.5M
Maintenance & Operations	$12.6M	$15.6M	$5.1M	$5.8M
2 Year Totals	**$19.6M**	**$28.3M**	**$12M**	**$12.3M**

Section 12 Incremental Costs

A state-wide IEP implementation may include several incremental costs areas for OSPI and districts during the transition period. These are not included in the scope of the CBA but may need to be accounted for in additional funding or a risk mitigation plan. An upcoming feasibility study regarding OSPI's data modernization should shed light on OSPI's technical stack and its capabilities to support any centralized technical resources. OSPI can then decide which functions to continue supporting internally, and which functions belong at the LEA-level. ISG recommends that these incremental cost areas are reviewed in an IPS. District-level control, diverse IEP systems, and minimal statewide tracking make it difficult to assess the full cost of IEPs. A statewide system would provide clear visibility into these expenses.

System transition & parallel operations costs

- OSPI and districts may need to coordinate running new and old IEP system concurrently during the transition period of 6-12 months.

  Specific costs may include:

  - Legacy system support during transition
  - Additional IT & helpdesk support for both systems

- Temporary staffing for data cleanup, validation, and migration

Increased workload for educators and district administrators

- Implementation of the new IEP system will require training, testing, and workflow adjustments. Specific costs may include:
- Temporary stipends for staff overtime, especially for IEP administrators, educators, and special education coordinators
- Productivity reduction by educators and administrators during the adoption phase, while they experience a learning curve.

Change management & additional district-level training

- The vendor may provide initial training in partnership with OSPI, but additional training at the district level may be necessary to ensure adoption. Specific costs may include:
  - Customized training for districts: Especially since districts will maintain authority, each district is assumed to have various ways of working that training will need to be tailored for.
  - District-level customizations: Unique district workflows may require additional configuration beyond the statewide standard IEP model.
  - Coaching and support: Districts may opt to provide additional resources for coaching & training in the first 12-24 months as users adopt the new IEP system.

IEP system scalability & future expansion

- A line item for enhancements is accounted for in the CBA, and enhancement requests can be expected by OSPI as more users adopt to the system and a natural alignment effort to district-level workflows steadily grow. District-level enhancements are not the only lever for system changes, however, and OSPI may need to allocate additional resources for future legislative & policy changes.
- OSPI may also need to fund infrastructure scalability over time that supplements what the vendor is willing to provide. ISG recommends that OSPI negotiate an unlimited data storage & hosting agreement for the lifetime of the IEP contract. If storage & hosting terms

are limited, specific costs may include data storage and hosting that were included in license fees for the first years of the licensing agreement.

Section 13 Benefits

The statewide IEP system presents various benefits for students, parents, educators, district administrators, associated nonprofit agencies, and OSPI. The study identifies benefits from market research data, persona interviews, workshops, benchmarking interviews with other statewide IEP directors, and with vendors. These benefits are thematic; cost-savings measurement requires unavailable statewide data. This underscores the need for a statewide solution to enable standardized data collection and accurate program evaluation. A statewide IEP system will provide accessible statewide data and the ability to create & track key performance indicators (KPI's) related to special education program performance for the first time. ISG recommends that as the statewide IEP is established, OSPI works with districts to align standardized KPI's that enable all parties to validate benefits like those described below.

Students

- **Strengthened Student Support**
    - Improved data-sharing ensures educators have up-to-date information, allowing for more coordinated and responsive support tailored to each student's needs.
- **Fewer Disruptions in Services**
    - Standardized digital records ensure seamless transitions when moving between schools or districts.
- **Enhanced Accessibility Features**
    - A modernized system will incorporate accessibility tools to better support students with varying needs.
- **Improved Academic and Educational Outcomes**
    - A well-structured IEP process ensures students receive the appropriate services to reach their full potential.

Parents

- **Greater Transparency into the IEP Process**
    - A centralized platform will provide real-time updates on student progress.
- **Easier Collaboration with Educators**
    - Digital communication tools will allow for more meaningful engagement between parents and schools.
- **Simplified Documentation and Tracking**
    - Parents will no longer need to juggle multiple paper forms and disparate systems.
- **More Advocacy and Support Opportunities**
    - Improved access to student data will enable parents to advocate more effectively for their child's needs.

OSPI

- **Automated data collection**
    - OSPI will gain the ability to produce customized data reports within the IEP, assisting with its federal reporting requirements.
- **Insights regarding services and enrollment**
    - A statewide IEP will aggregate data that can be collated & filtered to provide OSPI insights around services offered, program enrollment, and performance metrics related to those services & programs. This includes the Alternative Learning Experience (ALE), Online, Juvenile Justice, Open Doors, and Running Start programs.
- **Enhanced data-driven decision making**
    - With centralized reporting and analytics, OSPI will experience greater visibility into IEP outcomes, enabling more informed policymaking.
- **Improved Compliance Monitoring and Support**
    - The system will streamline compliance tracking, reducing administrative burdens while ensuring adherence to federal and state special education laws. IEP's will be

accessible at the student level. Service area gaps should be reduced due to OSPI having a direct data feed during the IEP drafting phase.

- **Consistent and Well-Coordinated Training and Professional Development**
    - Standardized IEP tools will allow OSPI to offer uniform training across all districts, ensuring educators and service providers have access to best practices. Training and technical assistance coordination should improve IEP development and implementation.
- **Optimized Resource Allocation & Improved Retention**
    - By leveraging data such as caseloads, staffing, and qualifications from the new system, OSPI can more effectively allocate funding and support to districts based on actual needs. Common training and supports may improve the retention of special education teachers.
- **Enhanced Stakeholder Communication**
    - With improved transparency, OSPI can better engage with districts, parents, and advocacy groups to build trust and collaboration.
- **Potential Contractual Discounts from IEP Vendor**
    - OSPI's choice to deploy a single vendor for the statewide IEP effort will produce a reliable, stable, and high revenue line of business for the chosen vendor. The increase in operational efficiencies, standardized support model, reduced complexities in systems & data hosting, and newfound monopoly in the state will benefit the vendor. ISG recommends that OSPI press for an enterprise discount compensatory to the hard and soft cost savings that the selected vendor would benefit from.

LEA's / Districts

- **Standardization of Processes**
    - The new system will establish a uniform approach to IEP development, reducing inconsistencies across districts.
- **Reduced Administrative Burden**

- Automated workflows and digital documentation will free up staff time, allowing for more direct student engagement.

- **Enhanced IEP Education**
  - The use of IEPs as an instructional tool will be available for districts and their educator teams. IEPs created around unique student needs and other scenarios would have the capability to be indexed for future reference. Model IEP's and those which produced risks before processes introduced mitigations can be flagged in the same manner to serve as valuable training artifacts.
- **Improved Compliance and Accountability**
  - Integrated compliance tracking will help districts meet federal and state mandates more efficiently. Districts will be able to run reports for compliance checks, professional development, and program improvement efforts.
- **Enhanced Collaboration Between Stakeholders**
  - Districts will be better equipped to coordinate with educators, service providers, and parents through a centralized platform. Multi-lingual capabilities in the tool encourage and support parents to become more involved in the IEP process and improve the cycle time of IEP creation & reviews.
- **Integrated Instructional Practices**
  - The statewide IEP system allows IEP goals to directly align with classroom instruction and progress monitoring tools, empowering educators to use IEPs as a living, actionable document that drives daily teaching & learning strategies.
- **Reduced Delays During Transfers**
  - Faster access to student documentation when students transfer within the state will minimize transfer delays, particularly for highly mobile student populations, such as students in detention facilities. Due to a more efficient transfer, the student's developmental history will remain intact without the need to manually search for their historical information

Educators and Student Service Providers

- **Increased Efficiency in IEP Development**
    - User-friendly interfaces and pre-built templates will reduce the time required to create, update, and manage IEPs. This frees educator time for instruction, planning, and other high-quality tasks related to their role in the IEP.
- **Improved Access to Student Data**
    - Real-time data sharing across stakeholders will support more personalized instruction.
- **Enhanced Professional Support**
    - Standardized training and resources will enable educators to improve their practice in supporting students with disabilities.
- **Better Integration of Services**
    - Coordinated data-sharing among educators, therapists, and other specialists will ensure more holistic student support.
- **Stronger Instructional Decision-Making**
    - Access to up-to-date student data empowers educators to make informed instructional decisions tailored to the needs of each student.

Third-party Organizations

- **Alignment with Statewide Standards**
    - Vendors must ensure that their products integrate seamlessly with the new IEP system.
- **New Business and Partnership Opportunities**
    - The shift to a centralized model may create opportunities for third party organizations to provide value-added services.
- **Increased Compliance and Data Security Requirements**
    - Third-party providers will need to adhere to stricter data privacy and accessibility regulations.

Section 14 Risk Management

The successful implementation and ongoing maintenance of the statewide IEP system, mandated by OSPI, relies heavily on the proactive identification, evaluation, and management of potential risks throughout its lifecycle. This section outlines the key risks associated with the project, the risk classification, the severity of the risk, and the mitigation strategies that will be employed by the implementation and maintenance teams.

By systematically addressing these risks, we aim to minimize potential disruptions, ensure the system's effectiveness, and promote long-term sustainability. This will ultimately benefit IEP students across Washington. Each identified risk will be categorized based on its likelihood and impact, with clear strategies to minimize or manage these risks effectively.

The following risks have been identified and are presented below, organized starting with the highest risk items.

Risk Description	Risk Classification	Severity	Mitigation Approach
Uncertainty Regarding System Alignment: Absence of a detailed SIS/IS inventory at the district level prevents effective compatibility analysis with the statewide IEP, increasing integration risk.	Technology	High	Ensure that a systems inventory and interoperability assessment are addressed in pre-implementation planning. Prepare to deploy customized integrations where necessary for legacy systems that do not integrate via API.
Data Migration: Moving local datasets to a single enterprise data host with varying technology levels across districts can prove difficult.	Technology	High	Develop a data validation plan during pre-implementation phase. Dedicate a development team to solely package the differing existing data sets and integrate those manually into the enterprise data set. Conduct multiple rounds of test migrations before go-live.

Districts Level Authority: Districts have decision making authority which may impact adoption, consistency, and efficiency statewide.	Governance	High	There will need to be active change management efforts and promotion efforts to get the districts to implement the new IEP system.
Vendor Dependency: A single vendor servicing the statewide IEP system could limit flexibility to adapt to future requirements and is dependent on the vendor's willingness to customize without charging inflated enhancement fees.	Contractual	High	OSPI should engage with WaTech Contracts & Procurement Unit for counsel and negotiate contractual protections with the vendor during the procurement phase. Require open data standards, ensure data ownership is retained by the state, and ensure exportable data formats.
Transition Disruption Risk: Disruptions to IEP Performance and Compliance During system implementation, students and parents may experience delays or gaps in services as educators and administrators adjust to the new IEP system & workflows	Customer	High	Conduct a phased rollout with pilot districts to refine processes before moving to a statewide adoption. Accept a parallel system operation during a transition period, allowing staff to reference old IEPs while using the new system. Plan for dedicated IEP transition support in each district, with the aim of minimizing student disruptions. Conduct a mandatory pre-launch training for all district-level users before accessing live student data.
Lack of Adoption: A new system will bring new processes and interfaces that are unfamiliar to users, potentially creating change resistance, confusion and increased support demands.	Org. Capability	High	Change management & training plans should be integrated and deployed together. Key internal users should participate in the design and testing of the new system to ensure it meets workflow and functional needs. These resources should participate in training of the remaining staff and should be considered "super users" post-roll out. External users should be provided with

			intuitive user interfaces enhanced by context sensitive help.
Staff Burnout During Implementation: OSPI and District-Level staff may be overwhelmed by the implementation workload while simultaneously supporting existing Special Education operations.	Org. Impact	Medium	Supplement staff with third party organization resources for both implementation and sustainment phases of the project. During pre-implementation planning, create a staff allocation plan and communicate expectations to staff. Create a feedback channel that allows staff to signal for assistance during peak workload periods.
Over-Customization: Requesting customizations or configurations without fulling understanding out-of-the-box capabilities in the IEP system could result in delays and future rollback requests	Training	Medium	This risk was communicated by other state IEP managers during benchmarking interviews. Prior to configuration and customization, fully orient the team to existing IEP tool capabilities and gauge if those solutions can meet the need, avoiding customization costs.
Insufficient Training: Educators and service providers may not be adequately trained, leading to improper system use	Training	Medium	Offer ongoing, roles-based training throughout the project lifecycle. Maintain a COE-led helpdesk for technical and process support. Ensure district representatives serve on the COE to advocate for district-specific processes and training needs.
Risk of Cost Overruns Due to Underestimated Project Expenses and Vendor Discrepancies: Discrepancies between vendor estimates and available funding, combined with underestimation of implementation, licensing, customization, and maintenance costs, threaten	Org. Impact	Medium	Employ phased implementation, focusing on core features initially, and minimize custom development to manage project scope and costs. Clear requirements in the procurement phase, separation of mandatory and optional service pricing, and budget contingency will ensure accurate vendor responses and controlled expenditures.

the project's financial stability.			A comprehensive budget encompassing all phases and ongoing costs, coupled with proactive vendor negotiation, will align project expenses with available funding.
District-Level Customizations: Districts have not only adopted various IEP systems, but may have different versions and customizations within their IEP systems which complicate a migration to the statewide IEP.	Technology	Medium	An inventory of the various IEP systems, SIS systems, and other critical information systems being used is already accounted for in this study's implementation plan. OSPI should ensure that system versions and district-specific customizations are also noted during the inventory process, then passed to the data migration team.

Section 15 Next Steps

Drawing from the feasibility study's in-depth analysis of Washington's current IEP landscape and the evaluation of potential vendors, the recommended procurement path is to proceed with a formal Request for Proposal (RFP) process. This approach will help drive competitive pricing from the vendors and ensure the selection process prioritizes solutions that can be readily adapted for the statewide system, minimizing the need for costly and time-consuming custom development. It is crucial to conduct a thorough review of the entire implementation plan, incorporating its recommendations, strategy, and approach to formalize and finalize OSPI's statewide strategy and approach for implementation. Following the study's guidance, the initial steps within the Pre-Implementation Phase 1 will concentrate on budget and contract assembly, focusing on refining budget estimates for staffing, infrastructure contingency, and vendor costs, while simultaneously developing a comprehensive stakeholder engagement plan.

Appendix

Approach

Below is a depiction of the feasibility study approach that the team took in partnership with OSPI to produce this document.

Requirements Gathering

In the Requirements Gathering phase, core processes were identified that would inform the most critical requirements for the statewide IEP system, which aligned to the experience of three core user personas. These processes were documented in detail to better understand the current pain points and key operational needs. The processes that were prioritized include:

Referral & Evaluation: The student is referred for an IEP and evaluated to determine if IEP eligible

IEP Development: The IEP team is organized, and an initial IEP is drafted & reviewed

Service Delivery: The IEP is finalized and agreed upon. The student begins IEP-related activities

Progress Monitoring: Period monitoring of student progress and needs determines applicable IEP adjustments

Annual Reviews: The IEP is formally reviewed annually to determine progress and further adjustments

Amendments: The formal process of adjusting the student's IEP in a transformative manner

Transition Planning: Preparing to move the student between districts or adjust the student from an IEP to post-secondary education.

From an initial IEP system demonstration, three user personas were identified and used to document current state user journeys which represented the core in-scope processes. These journeys and ideation on future state capabilities were refined during collaborative working sessions with representatives from each persona group. This led to a comprehensive understanding of technical requirements and core business processes that the statewide IEP solution must deliver and ways to reduce pain points in a future state solution.

While documenting future state processes, the team validated IEP system functional, technical, and statutory requirements from those provided by OSPI. These requirements were consolidated into a Universal Requirements Document (URD), which served as the foundation for the subsequent project phase known as "Solution Fit/Gap". The URD was produced as part of the OSPI Business Background and Needs Assessment and was a key tool in delivering the Market Research Report, and Solution Assessment - Fit/Gap Analysis.

Existing Documentation & Previous Efforts

For years, OSPI has sought to improve student outcomes through a series of efforts to identify processes, systems, and lessons-learned for integration into their statewide IEP effort. The table below outlines key reference materials that were used in the preparation of this Study:

Document Title	Author	Publish Date	Description	Application
Washington Statewide IEP Final Report	**WestEd:** Zach Smith, et. al.	December 2023	OSPI commissioned WestEd to generate a report regarding the feasibility and interest in a statewide online IEP system. WestEd generates its findings and recommendations for such a model in this document.	• Benchmarking information • User persona validation • System requirements validation • Risk identification
Every Minute Counts: Calculating IEP Services to Improve Student	**Johns Hopkins IDEALS Institute:** Dr. Jennifer	2022	"Every Minute Counts…" was a project between John's Hopkins IDEALS and OSPI to identify current-state problems related to Washington IEP development	• Benchmarking information • OSPI background /

Outcomes in Washington State	Kouo, Dr. Andrea Harkins Brown, Vy Phung		and generate a literature review which highlights best-practices that are supported by federal and state legislature.	historical information • Benchmarking & networking contacts • IEP process knowledge • Legislation information
Business Requirements Document (BRD) – Statewide IEP Platform	**OSPI**	2024	This BRD outlines the business requirements for a centralized statewide IEP platform for Washington State. It includes information regarding the current landscape, pain points & challenges, and IEP process steps. The BRD then outlines system requirements related to functional, technical, and statutory themes.	• OSPI background / historical information • User persona generation • IEP process knowledge • System requirements validation
OSPI Statewide IEP Interview Notes	**OSPI**	2024	OSPI conducted multiple interviews with its internal team, administrators, and educators around the state. In these interviews, they collected feedback regarding current IEP process & system performance, pain points, and needs for the future statewide IEP.	• OSPI background / historical information • User persona generation • Needs and pains assessment information • IEP process knowledge • System requirements validation

Online Resources

Title	Address	Deliverable
Office of Financial Management	ofm.wa.gov	• CBA • Market Research Report
Washington State Legislature	app.leg.wa.gov	• Market Research Report
Office of Superintendent of Public Instruction	ospi.k12.wa.us	• All Deliverables
OSPI Report Card	reportcard.ospi.k12.wa.us	• Feasibility Study

Solution, Fit Gap & Benchmarking

Minimum criteria for vendor inclusion in this study was confirmation that the vendor could execute the key processes described in the previous section. The vendor list was sourced by performing independent market research and via benchmarking conversations with department peers from Washington and other states.

The vendors evaluated during this phase are listed here:

Full Participation:

- Public Consulting Group (PCG)
- PowerSchool
- Frontline Education
- Embrace

Non-Responsive or Selected Out:

- Infinite Campus
- Special Education Automation Software (SEAS)
- E-IEP Pro
- Edupoint

Vendors who opted to participate in the study were required to provide key data elements to assess fit against OSPI functionality requirements, budget, and implementation timeline needs. These materials allowed the team to become more oriented to vendor solution offerings and to gauge overall industry trends. The URD Self-Assessment provided by each vendor was used to produce a fit/gap score, evaluating the level of fit and gaps against OSPI requirements for each solution. An additional assessment was then conducted to score vendors against strategic delivery areas that are critical for a successful statewide IEP implementation. In addition to the requirements and strategic assessments, cost estimates were collected from each vendor to build a detailed cost benefit analysis.

Vendors provided public sector customer references that utilize the core capabilities desired by OSPI. A benchmarking interview guide was developed to gather necessary insights and data points from these conversations that would shape OSPI's delivery model, implementation strategy, and cost projections. Lessons learned were ~~also~~ included in interview discussions to proactively identify and address future challenges. One customer was interviewed from each of the four participating vendor candidates.

Customers Interviewed for Benchmarking

- North Carolina Department of Public Instruction – IEP Online
- Lake Washington School District – IEP Online
- Alabama State Department of Education - PowerSchool
- Hillsborough County Public Schools - Frontline
- Issaquah School District - Embrace

All data and findings collected during benchmarking and vendor engagement activities were presented in the Market Research Report Deliverable.

Implementation Approach

The ISG team conducted early benchmarking discussions with clients, interviewed the viable vendors (all vendors mentioned they had their own system integration teams), and analyzed

sample vendor implementation plans. OSPI business needs and priorities were also ~~understood and~~ included in the high-level implementation plan to ensure project success. All vendors in this study offer a cloud-based SaaS solution to support the OSPI program needs, no major technology infrastructure investment is needed for this implementation. Vendors proposed a 12–24-month timeline for implementing the provided requirements. Additional details regarding this topic can be found in the Implementation Plan.

Prepare Feasibility Study

Feasibility studies represent a significant investment for any agency pursuing a technological solution. Their value lies in providing an unbiased, third-party evaluation of market options using both qualitative and quantitative analysis. These studies offer fresh perspectives, actionable insights, and tailored recommendations to internal stakeholders. In this case, ISG has conducted a comprehensive assessment and recommends that OSPI proceed with an official procurement process to identify the most suitable solution for a statewide IEP system.

Acronym Library

ADA: Americans with Disabilities Act

AI: Artificial Intelligence

ALE: Alternative Learning Experience

API: Application Programming Interface

CBA: Cost Benefit Analysis

CEDARS: Comprehensive Education Data and Research System

COE: Center of Excellence

DCYF: Department of Children, Youth, and Families

DES: Department of Enterprise Services

DSA: Data Structures & Algorithms

EDS: Education Data System

ESD: Educational Service District

FAPE: Free Appropriate Public Education

FTE: Full Time Equivalent

GenEd: General Education

HCA: Washington Health Care Authority

IDEA: Individuals with Disabilities Education Act

IEP: Individualized Education Program

IFSP: Individualized Family Service Plan

IPTN: Inclusionary Practices Technical Assistance Network

IPS: Implementation Planning Study

IS: Information System

ISMS: Information Security Management System

KPI: Key Performance Indicators

LEA: Local Education Agency

LMS: Learning Management System

LRE: Least Restrictive Environment

MFA: Multi-factor Authentication

MSA: Master Services Agreement

MTSS: Multi-Tiered System of Supports

MVP: Minimum Viable Product

NASPO: National Association of State Procurement Officials

OCIO: Office of the Chief Information Officer

OCM: Organizational Change Management

OSPI: Office of the Superintendent of Public Instruction

PCG: Public Consulting Group

PHI: Protected Health Information

PII: Personally Identifiable Information

PMP: Project Management Plan

QA: Quality Assurance

RAID: Risk, Issue, Action, and Decision

RFP: Request for Proposal

SAW: Secure Access Washington

SDI: Specially Designed Instruction

SIS: Student Information System

SIT: Student Information Team

SLA: Service Level Agreement

SME: Subject Matter Expert

UAT: User Acceptance Testing

UDL: Universal Design for Learning

WaTech: Washington Technology Solutions

WSIPC: Washington School Information Processing Cooperative

Interview References

The following table outlines the key partners and interviewees involved in the study, detailing their specific contributions and the type of evidence or insights gathered from each.

Interview Target	Project Phase	Objective
Lake Washington School District	Requirements Validation	IEP System demo for the project team to understand their functionality
WSIPC	Requirements Validation	Understand the current state of the technical infrastructure impacting the IEPs and what kind of data gets passed when performing the IEP process
Students and Parents • The Arc of King County • Roots of Inclusion • Inclusion for All	Journey Mapping Exercise	Follow how each user interacts with the IEP system, and highlight pain points, inefficiencies, and required features from the perspective of the students and parents
Administrators • Pullman Public Schools • Toppenish School District • Capitol Region ESD – 113 • Omak School District	Journey Mapping Exercise	Follow how each user interacts with the IEP system, and highlight pain points, inefficiencies, and required features from the perspective of the administrators

Teachers • Omak School District • Pullman Public Schools • North Thurston High School	Journey Mapping Exercise	Follow how each user interacts with the IEP system, and highlight pain points, inefficiencies, and required features from the perspective of the teachers
PCG	Vender Demo	Gather background on the experience of the vendor performing large scale system implementations and view the vendor's tool and its features
Frontline	Vendor Demo	Gather background on the experience of the vendor performing large scale system implementations and view the vendor's tool and its features
PowerSchool	Vendor Demo	Gather background on the experience of the vendor performing large scale system implementations and view the vendor's tool and its features
Embrace	Vendor Demo	Gather background on the experience of the vendor performing large scale system implementations and view the vendor's tool and its features
North Carolina Department of Public Instruction	Vendor Benchmark Interview; PCG	Gain insights on IEP provider effectiveness in terms of tools, implementation, customer service, and overall experience
Issaquah School District	Vendor Benchmark Interview; Embrace	Gain insights on IEP provider effectiveness in terms of tools, implementation, customer service, and overall experience
Alabama State Department of Education	Vendor Benchmark Interview; PowerSchool	Gain insights on IEP provider effectiveness in terms of tools, implementation, customer service, and overall experience
Hillsborough County Public Schools	Vendor Benchmark Interview; Frontline	Gain insights on IEP provider effectiveness in terms of tools, implementation, customer service, and overall experience