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# From Caseload to Workload

*A response to the Council for Exceptional Children's 2026 position, and a proposed measurement model for special education workforce capacity*

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## Abstract

In July 2026 the Council for Exceptional Children (CEC) endorsed moving special education staffing from a caseload approach, which counts students per educator, to a workload approach, which accounts for all direct and indirect work that educators perform. This paper analyzes that position and argues that it is correct in direction but incomplete in one decisive respect: it does not define how workload should be measured. The position's own worked example reports workload percentages without stating the capacity those percentages are taken against. The paper reviews the professional guidance that preceded CEC's statement, the research linking workload manageability to burnout and attrition, and the federal and state rules that govern caseloads, including the absence of any federal caseload limit and the hybrid rules already in force in Illinois and Ohio. It then proposes a measurement model built on a provider-week unit of analysis, in which mandated direct service, required indirect work and contracted capacity are each measured explicitly, missing inputs are reported rather than assumed, and ratio-based roles are priced separately from minutes-based roles. The paper closes with implications for federal and state policy, district practice and research, and with the limitations of both the position and the proposed model.

*Keywords:* special education workload, caseload standards, workforce sustainability, related services, teacher attrition, measurement

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## Author note

Eric P. Oxford is co-founder and managing member of The Inclusive Practice, LLC, Boston, Massachusetts.

**Conflict of interest.** The author co-founded The Inclusive Practice, LLC, which develops and sells PULSE, a software platform that models special education workload. The measurement model in Section 5 is described conceptually and is offered for adoption by any district, state, vendor or researcher without reference to any product. No external funding supported this paper. No organization named in it reviewed or endorsed it.

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# 1. Introduction

Every school district that serves students with disabilities answers the same staffing question many times a year: is this educator full? For most of the history of special education in the United States the answer has been given as a count. A speech-language pathologist serves a number of students; a special education teacher carries a number of individualized education programs (IEPs); a school psychologist covers a number of enrolled students. The count is easy to collect, easy to compare and easy to write into a rule. It is also, as a growing body of professional guidance has argued, a poor description of the work.

In July 2026 the Council for Exceptional Children (CEC), a national professional association of special educators, approved a position statement titled *Position on Caseload vs. Workload* (CEC, 2026). The statement observes that caseload maximums count students and that this practice “frequently overlooks the qualitative complexity and actual demands of special education service delivery” (CEC, 2026). It concludes that CEC “endorses moving to a Workload Approach” and offers five recommendations for districts and states making that transition (CEC, 2026). The position joins earlier statements by the American Speech-Language-Hearing Association (ASHA, 2002), and a joint document by the American Occupational Therapy Association, the American Physical Therapy Association and ASHA (American Occupational Therapy Association et al., 2014), each of which reached the same conclusion for related service providers.

The stakes are not abstract. The number of students served under the Individuals with Disabilities Education Act (IDEA) reached 7.5 million in the 2022-23 school year, or 15 percent of public school students (National Center for Education Statistics [NCES], 2024). Special education teachers have long left their positions at higher rates than most other teachers (Carver-Thomas & Darling-Hammond, 2017), and research on both special educators and school-based speech-language pathologists links the manageability of the workload to emotional exhaustion and to intentions to leave (Bettini et al., 2017; Marante et al., 2023). When a district cannot see how much work its educators are carrying, it cannot tell a sustainable assignment from an unsustainable one until someone resigns.

This paper responds to the CEC position in that context. Its argument has three parts. First, the position is right about direction: a count of students is not a measure of work, and the field should staff to workload. Second, the position is incomplete in a specific and consequential way. It describes what a workload approach should include, but it does not say how workload should be measured, against what capacity, or how to handle the information districts often do not have. Its own worked example reports two teachers at 106 percent and 58 percent of something it never names (CEC, 2026). Third, the gap can be

closed. The paper proposes a measurement model, built from the elements that existing state rules and professional statements already name, that a district, state or researcher could adopt and test.

The paper proceeds as follows. Section 2 sets out the conceptual framework. Section 3 reviews the literature on caseload and workload approaches, workload and attrition, and the cost of turnover. Section 4 analyzes the CEC position in detail. Section 5 proposes the measurement model. Section 6 discusses implications for policy and practice, including the federal and state caseload landscape. Section 7 states limitations, and Section 8 concludes.

A note on terms. In this paper *caseload* means the number of students assigned to an educator or provider. *Workload* means the total of the activities the educator is required to perform, measured in time. *Capacity* means the time the educator is contracted and available to perform that work. *Provider* refers to special education teachers and specialized instructional support personnel, including speech-language pathologists, occupational therapists, physical therapists and school psychologists, unless a narrower group is named.

## 2. Conceptual Framework

### 2.1 Demands and Resources

The framework for this paper draws on the job demands-resources model of burnout. In its original formulation, Demerouti et al. (2001) reported that “job demands are primarily related to the exhaustion component of burnout,” while “(lack of) job resources are primarily related to disengagement.” Bakker and Demerouti (2007) later summarized the development of the model across occupations. The model is useful here because it separates two questions that staffing debates often merge. One is how much the job asks of a person. The other is what the organization provides to help the person meet that demand. A caseload number speaks to neither directly. It is a proxy for demand, and a weak one, because two caseloads of the same size can contain very different amounts of work.

Workload, as defined in the professional statements reviewed below, is a direct measure of demand expressed in time. Capacity, expressed in the same unit, is a structural resource: the contracted hours in which the work can be done. Placing demand and capacity on one scale makes their relationship observable. This is the core move that the CEC position endorses, and it is the move that the measurement model in Section 5 tries to make precise.

### 2.2 Belief, Practice and Capacity

The second strand of the framework comes from the author’s prior research. In a qualitative study of ten administrators in a single Massachusetts public school district, five principals and five special education team chairpersons, participants described “the

presumed misalignment between schools’ practices and inclusive philosophies” and named as barriers a “lack of district-wide training, lack of resources, and an overall lack of support” (Oxford, 2020). The study also found that participants “were not aligned in their definition of an inclusive philosophy” (Oxford, 2020). It was designed to describe one district in depth, not to generalize.

A later white paper by the same author proposed that the distance between belief and practice in inclusion is, at its operational root, a gap in workforce capacity, and that this gap is measurable as workload against contracted time (Oxford, 2026). That argument is a hypothesis, not a finding of the 2020 study. It is restated here because it explains why measurement matters for inclusion and not only for staffing. When a district cannot see where capacity is failing, it tends to discover the failure through its consequences: an educator’s departure, a missed service, or a move of a student to a more restrictive setting. Federal law requires that removal of a student with a disability from the regular educational environment occur “only if the nature or severity of the disability is such that education in regular classes with the use of supplementary aids and services cannot be achieved satisfactorily” (34 C.F.R. § 300.114(a)(2)(ii)). A district that cannot measure the capacity of the staff who deliver those aids and services is poorly placed to make that judgment.

## 2.3 Measurement as the Precondition

The third strand is a simple proposition about management: a quantity that is not measured cannot be managed on purpose. Compliance systems in special education measure whether IEPs are written, whether timelines are met and whether services are documented. Federal regulations require each IEP to state “the anticipated frequency, location, and duration” of services (34 C.F.R. § 300.320(a)(7)). The direct half of workload is therefore already recorded, student by student, in every district. What is rarely recorded in the same unit is the other half of the work and the time available to do it. The framework treats the move from caseload to workload as, first, a measurement problem, and only then as a policy or budget problem.

# 3. Literature Review

## 3.1 The Professional Case for Workload

The workload argument has been made most consistently by the related service professions. In 2002 ASHA adopted a position statement titled *A Workload Analysis Approach for Establishing Speech-Language Caseload Standards in the School*. It states that “Workload refers to all activities required and performed by school-based SLPs” and that “Caseload is more accurately conceptualized as only one part of SLPs’ total workload” (ASHA, 2002). Notably, the statement declined to set a number: “This position statement does not include

a recommended maximum caseload number” (ASHA, 2002). It also linked size to legal purpose, noting evidence suggesting “that large caseloads impede the intent of IDEA from being fully implemented” (ASHA, 2002). ASHA’s current Practice Portal on caseload and workload keeps the same definitions and states that “There is no research to support a specific caseload size” (ASHA, n.d.).

In 2014, AOTA, APTA and ASHA issued a joint document, *Workload Approach: A Paradigm Shift for Positive Impact on Student Outcomes*. It contrasts the caseload method, which “designates staff based on a specific number of students assigned,” with workload, which “refers to all activities required to be performed by” related service providers and specialized instructional support personnel (American Occupational Therapy Association et al., 2014, pp. 1–2). The three organizations “jointly endorse a paradigm shift to a workload model in educational settings” (American Occupational Therapy Association et al., 2014, p. 4). AOTA’s current guidance for school practice describes workload as encompassing “all the work activities you perform that benefit students directly and indirectly” and calls a workload model “an effective way to approach school-based occupational therapy services” (AOTA, n.d.).

Adoption has lagged endorsement. In a national survey of school-based occupational therapy practitioners, Seruya and Garfinkel (2020) reported that “practitioners wanted to move their practice to a workload model” but described barriers that included a lack of administrative support, time, procedural knowledge and advocacy skills. ASHA’s 2024 Schools Survey found that the median actual monthly caseload of full-time, school-based clinical service providers was 50, while the same respondents “said that 40 was a manageable caseload size” (ASHA, 2024). The same survey reported that these clinicians “spent an average of 23 hours weekly in direct intervention and 6 hours on documentation” (ASHA, 2024). Those figures describe a workforce whose indirect work is substantial and whose stated sense of a manageable load sits well below its actual load.

School psychology has taken a different path. Its national association expresses staffing as a ratio to all enrolled students rather than as a caseload of students with disabilities. As summarized by the Wisconsin Department of Public Instruction, “The National Association of School Psychologists (NASP) recommends a ratio of 1 School Psychologist per 500 students,” citing NASP’s 2020 professional standards (Wisconsin Department of Public Instruction, n.d.). This distinction matters for measurement. A ratio of this kind is a population standard for a role whose work is largely evaluation, consultation and prevention. It is not a minutes-based workload standard, and a single workload method applied to every role would misdescribe it. The model in Section 5 treats this difference explicitly.

### 3.2 Evidence on Workload Approaches

Empirical evaluation of workload approaches is limited. The study CEC cites most directly is Carlin (2024), an exploratory comparison of workload and caseload approaches among school-based speech-language pathologists. In that study, “Five speech-language pathologists were selected to implement one of the four WAs, and two used the CA,” where WA denotes a workload approach and CA a caseload approach (Carlin, 2024). The author reported that “the Workload Management Strategies (WMS) Approach was associated with the most indicators of success in the study” and that “all students received the services that were documented on their IEPs” (Carlin, 2024). With seven clinicians and an exploratory design, the study is best read as evidence that workload approaches are feasible and promising, not as evidence of their effect size.

An earlier study by the same investigator was commissioned by the Ohio Department of Education. Its final report observed that Ohio’s operating standards already directed districts “to consider the scheduling and time demands of various workload duties when calculating caseload ratios,” and found that this framework was not widely used (Carlin et al., 2013). Participating districts recommended that the state “consider a productivity approach” in which students would “be weighted based on an established rubric rather than simply utilizing a head count,” and that it “Base caseloads on student needs, not disability categories” (Carlin et al., 2013). Ohio now publishes a workload calculator, which its Office for Exceptional Children describes as “an example of a workload process” while noting that “this calculator is not the only way to calculate workload” (Ohio Department of Education and Workforce, 2025).

Direct observation of how special educators spend their time is also scarce. Vannest and Hagan-Burke (2010) studied “36 special education teachers representing 4 variations of instructional arrangements,” combining teacher self-recording with concurrent direct observation across roughly 2,200 hours of data. Their categories, which included academic instruction, non-academic instruction, instructional support, paperwork and other responsibilities, remain a useful template for any time study. Time studies of this kind are the evidence base a workload model ultimately needs, because they test whether the minutes assigned to each activity match the minutes the activity actually takes.

### 3.3 Workload, Burnout and Attrition

Research on the special education workforce has consistently placed working conditions at the center of attrition. Billingsley and Bettini (2019) synthesized 30 studies of special education teacher attrition and retention published from 2002 to 2017 and reported that “Most studies examined working conditions (e.g., demands, administrative and collegial supports, resources, compensation).” Mason-Williams et al. (2020) argued that efforts to date “have largely failed to remedy SET shortage” and concluded that “SET shortage cannot be addressed successfully without improving working conditions.”

Workload manageability has emerged as a specific mechanism. In a study using data from the Michigan Indiana Early Career Teacher Study, Bettini et al. (2017) reported that novice special educators “rated their workloads less manageable than novice elementary and middle school general educators,” and that workload manageability “predicted emotional exhaustion, which mediated a relationship between workload manageability and career intentions.” Bettini and Gilmour (2024), in a research brief for school leaders, wrote that “Overwhelming workloads are a major factor contributing to special education teachers’ burnout and intent to leave,” and that “special educators report higher workloads than their general education colleagues.” They recommended “ensuring manageable workloads and adequate planning time.”

The pattern holds for related service providers. Marante et al. (2023) surveyed 453 school-based speech-language pathologists between September and December 2020 and found that perceived workload manageability was the strongest predictor of total stress and of two core dimensions of burnout, emotional exhaustion and depersonalization. The timing, during the COVID-19 pandemic, and the single discipline limit how far that result generalizes. A grounded-theory study of school-based speech-language pathologists who identify as overwhelmed reported that “Participants indicated an invisible workload for school-based SLPs consisting of three major factors” (Palafox et al., 2025). The word *invisible* recurs across this literature for a reason. Much of the work that drives the load is not counted by the instrument most districts use to judge it.

### 3.4 Shortage and Turnover

The Learning Policy Institute has documented the scale of the problem across two reports. Sutchter et al. (2016) analyzed national teacher supply and demand, reported annual teacher attrition near 8 percent, and estimated that cutting attrition in half would virtually eliminate the national shortage. Special education was among the fields in which most states reported shortages. Carver-Thomas and Darling-Hammond (2017) reported that “special education teacher turnover rates are greater than those of most other categories of teachers” and that “Mathematics, science, and special education teachers have higher turnover rates, exceeding 13% annually.” In discussing special education teachers specifically, the authors pointed to difficult working conditions, including a lack of administrative support, a lack of collaboration and excessive paperwork (Carver-Thomas & Darling-Hammond, 2017).

Turnover carries a direct cost. The Learning Policy Institute estimates the cost of replacing a teacher at “\$11,860 per teacher for small districts (under 10,000 students),” “\$16,450 per teacher for medium districts (10,000–50,000 students)” and “\$24,930 per teacher for large districts (more than 50,000 students)” (Tan & Patrick, 2024). These are general teacher

estimates, not special education estimates, and they do not include the cost of contracted coverage or of services owed when a position is vacant. Mason-Williams et al. (2020) noted that “school budgets are burdened by turnover and, in some cases, litigation.”

### 3.5 Summary of the Literature

Three conclusions follow. First, the professional consensus in favor of workload is broad and more than two decades old, and CEC’s statement extends it from related service providers to special education teachers. Second, the evidence that workload manageability predicts exhaustion and intentions to leave is consistent across special educators and speech-language pathologists, though most studies are cross-sectional and several were conducted under unusual conditions. Third, the evidence on workload approaches themselves is thin. There is little research comparing staffing outcomes under different methods, and there is no shared, operational definition of how workload should be measured. That last gap is the focus of the rest of this paper.

## 4. Analysis of the CEC Position

### 4.1 What the Position Says

CEC defines the caseload approach as “Assigning students to teachers and related service providers solely based on the number of students” and the workload approach as encompassing “all activities required and performed by special education teachers and related service providers to service students with disabilities” (CEC, 2026). It acknowledges that “Some states have instituted caseload maximums for special education teachers, case managers, and related service providers,” and that “IDEA gives each state the ability to set guidelines for program or service delivery” (CEC, 2026).

The position includes a comparison table. Under “Primary Focus,” the caseload approach is described as “Headcount of students” and the workload approach as “Time and effort required.” Under “Key Metric,” the caseload approach uses a “Student-to-Educator Ratio” and the workload approach a “Comprehensive Task Assessment.” For “Consideration of Indirect Tasks,” the table answers “No” for caseload and “Yes” for workload (CEC, 2026). The indirect activities named in the statement include “collaboration with staff, administrators, and related service providers,” “completion of special education paperwork,” “collaboration with families and outside agencies” and “data collection” (CEC, 2026).

The position offers five recommendations: “Transition to a Comprehensive Workload Analysis Model,” “Prioritize Data-Driven Decision-Making,” “Foster Administrative Support and Collaboration,” “Advocate for Policy Alignment” and “Continuous Evaluation and Flexibility” (CEC, 2026). It advises that “Districts should invest in tools and processes (e.g.,

workload calculators, time studies)” and that “Workload models must be dynamic and flexible, allowing for adjustments based on changes in student enrollment” (CEC, 2026). It cites the Carlin (2024) study and a research brief by Bettini and Gilmour (2024) in support.

Finally, the position includes a worked example. It notes that “two teachers might both have 15 students.” One, under the heading “High-Intensity Needs,” is shown at “2,550 Minutes (106%)”; the other, under “Low-Intensity Needs,” at “1,400 Minutes (58%)” (CEC, 2026).

## 4.2 Strengths

The position has four clear strengths. First, it extends the workload argument, long made by the related service professions, to special education teachers. That is significant, because teachers make up the largest share of the special education workforce and are the group for which caseload maximums are most often written into state rules. Second, it names indirect work explicitly and treats it as part of the job rather than as overhead. Third, it recommends specific instruments, workload calculators and time studies, rather than leaving “workload” as a slogan. Fourth, its worked example is well chosen. Two teachers with the same caseload, one carrying nearly twice the work of the other, is the clearest possible demonstration that a count can conceal the thing it is meant to describe.

The position is also candid about cost. Its table lists the primary limitation of the workload approach as “Complexity of implementation and data collection” (CEC, 2026). That admission is accurate, and it points directly at the work still to be done.

## 4.3 Gaps

The analysis that follows is offered in support of the position, not against it. Each gap is one that districts will meet as soon as they try to act on the recommendations.

**The denominator is unstated.** The worked example reports Teacher A at 106 percent and Teacher B at 58 percent, but the position does not say what the percentages are a percentage of. Working backward, 2,550 minutes at 106 percent and 1,400 minutes at 58 percent are both consistent with a capacity of roughly 2,400 minutes per week, about forty hours, though rounding makes the exact figure uncertain. If that is the intended capacity, it is a gross figure. It does not deduct a duty-free lunch, protected planning time or non-instructional duties, each of which is set by contract and varies by district. A percentage of workload has no meaning until its capacity is defined, and two districts adopting the same calculator with different capacity assumptions will reach different conclusions about the same teacher. This is the single most important gap in the position, and it is the one Section 5 is built to close.

**No rule for converting mandates to weekly minutes.** IEPs state frequency and duration, but not always per week. Services may be written per day, per week, per month or per cycle of several school days, and many districts operate rotating schedules. Group delivery further changes the relationship between a student's mandated minutes and the provider's time: thirty minutes of service delivered to a group of three students takes thirty minutes of the provider's week, not ninety. The position does not address either conversion. Both are sources of large and silent error in any workload calculation, and both must be stated for results to be comparable across districts.

**Indirect work is named but not quantified.** The position lists categories of indirect work but gives no guidance on how to estimate them. Some indirect work is mandated and countable, such as consultation minutes written into an IEP. Some is event-driven, such as evaluations and annual reviews, whose number can be counted from compliance data. Some is recurring but rarely recorded, such as collaboration with general educators. Each kind calls for a different method, and a model that treats them alike will either overstate or understate the load.

**One method for all roles.** The position speaks of special education teachers and related service providers together. The literature reviewed above shows that some roles, notably school psychology, are staffed by population ratios rather than by service minutes (Wisconsin Department of Public Instruction, n.d.). A minutes-based workload method applied to a role whose work is mostly evaluation and consultation would produce a number that looks precise and means little.

**No threshold.** The worked example implies that 106 percent is too much and 58 percent is too little, but the position does not say what range is sustainable, whether a planning margin should be held back, or how long a provider may operate above capacity before action is required. A measurement without a decision rule invites each district to choose its own, which reintroduces the variability the workload approach is meant to remove.

**No treatment of missing data.** Districts that try workload analysis quickly discover that inputs are incomplete. Contract hours may not be on file. Service frequencies may be written ambiguously. Evaluation counts may be held in a separate system. The position does not say what a calculator should do when an input is missing. The common default, substituting zero or a typical value, produces a confident number that is wrong, and wrong in the direction that understates load.

**The relationship to state caps is unresolved.** The position recommends advocacy for policy alignment but does not say whether workload should replace state caseload maximums, sit beside them or set a floor beneath them. As Section 6 shows, two states have already chosen a hybrid, and the choice has consequences.

**A narrow evidence base.** The position cites two works. One is an exploratory study of seven clinicians (Carlin, 2024). The other is a research brief whose finding on workload and intent to leave is well supported by the wider literature (Bettini & Gilmour, 2024). A stronger position would draw on that wider literature, including the predictive studies of workload manageability (Bettini et al., 2017; Marante et al., 2023), the long record of professional guidance (American Occupational Therapy Association et al., 2014; ASHA, 2002) and the state experience in Ohio and Illinois. There are also two small citation inconsistencies in the statement: an in-text citation to Carlin dated 2023 where the reference list gives the 2024 issue, and an in-text citation to “Bettini, 2024” for a brief co-authored with Gilmour. Neither affects the argument, but a position intended to guide state policy should be precise about its sources.

#### 4.4 Assessment

The CEC position does what a position statement is designed to do. It states a direction, explains why, and gives practitioners permission and language to move. What it does not provide is a specification. That is a reasonable division of labor for a professional association, but it means the next step falls to districts, states and researchers, and without a shared method each will build its own. The rest of this paper offers one.

## 5. A Proposed Measurement Model for Workload

### 5.1 Design Principles

The model rests on six principles, each drawn from the analysis above.

1. **Measure in time, at the provider-week.** The unit of analysis is one provider in one week. A week is long enough to contain the regular rhythm of school services and short enough to correspond to how contracts and schedules are written.
2. **State the denominator.** Every workload figure is reported with the capacity it was measured against, and capacity is derived from the provider’s own contract rather than from a national assumption.
3. **Measure direct and indirect work separately.** The two halves come from different sources, carry different uncertainty, and suggest different remedies. They are added only after each is measured.
4. **Price each role by the method that fits it.** Roles staffed by service minutes are measured in minutes. Roles staffed by population ratios are measured by ratio. The two are never combined into a single figure.

5. **Unknown is not zero.** When an input is missing, the model reports that the figure cannot be computed and names the missing input. It does not substitute a default and present the result as a measurement.
6. **Separate the measurement from the threshold.** The model computes utilization. Whether a given level is acceptable is a policy decision, set openly by the state or district and applied consistently.

## 5.2 Capacity

Capacity is the time a provider is contracted and available to do the work of the role in a week. For a provider at 1.0 full-time equivalent (FTE), it is computed from the collective bargaining agreement or employment contract that governs the provider's building and role:

$$C = (h \times d \times 60) - L - P - N - K$$

where  $h$  is contracted hours per day,  $d$  is contracted days per week,  $L$  is the weekly duty-free lunch,  $P$  is protected planning time,  $N$  is non-instructional duties assigned by contract (for example, arrival or dismissal supervision), and  $K$  is protected collaboration time if the contract reserves it, all in minutes per week. For a provider at less than 1.0 FTE, capacity is scaled by the FTE fraction at each building.

Two features of this definition matter. First, protected planning time is subtracted. It is contracted time for the provider's own preparation, and counting it as available for services would treat a contractual protection as spare capacity. Second,  $d$  is a stated value. Many calculations assume five days. A provider contracted for three days takes three lunches, not five, and an assumed week produces a capacity that looks correct and is not. Where the number of days is not stated, the model records it as assumed and says so.

Capacity in this sense is a structural resource in the terms of the job demands-resources model. It is also the quantity that collective bargaining already defines precisely, which means a district does not need to estimate it. It needs to read it.

## 5.3 Direct Work

Direct work is the service time a provider delivers to students, derived from IEP mandates. For each service line assigned to a provider, the mandated frequency and duration are converted to minutes per week:

$$m = (f \times t \times 5) / c$$

where  $f$  is the number of sessions per cycle,  $t$  is the duration of each session in minutes, and  $c$  is the length of the service cycle in school days. A weekly service has  $c = 5$ ; a service written per six-day rotation has  $c = 6$ . The cycle length is taken from the IEP's own wording where it is stated. Where it cannot be determined, the service line is held out and counted as unresolved rather than assumed to be weekly.

Group delivery is then applied. When a service is delivered to a group of  $g$  students together, the provider's time for that line is  $m / g$ . Group size is a fact about how services are delivered, and it is often not recorded. When it is unknown, the model faces a choice between two errors. Assuming a group larger than the real one understates the provider's load; assuming a group smaller than the real one overstates it. The two errors are not symmetric in their consequences. Understating load can lead a district to conclude that a position is not needed. The model therefore takes the conservative reading, treating unknown grouping as individual delivery, discloses the assumption beside the figure, and invites the district to state its actual grouping.

Direct work for the provider is the sum across assigned service lines:

$$D = \sum (m_i / g_i)$$

## 5.4 Indirect Work

Indirect work is the part of the job that CEC, ASHA and the joint AOTA, APTA and ASHA document all name and that a caseload count omits. Illinois requires that workload limits consider "consultative services and other collaboration among staff members," "attendance at IEP meetings and other staff conferences" and "paperwork and reporting" (23 Ill. Admin. Code § 226.735). Ohio lists, among the components of workload, "staff meetings, professional development, supervisions, travel/transitions, screening, assessment, evaluation," together with "progress documentation and reporting" and "conferencing/consultation collaborative planning" (Ohio Admin. Code 3301-51-09(I)(1)(a)). These lists are a ready-made content specification.

The model measures indirect work through three channels, each matched to the kind of evidence available:

1. **Mandated indirect service.** Consultation minutes written into an IEP are converted to weekly minutes exactly as direct service is, and they belong to the provider assigned to the service line.
2. **Event-driven work.** Evaluations, reevaluations and annual IEP meetings occur a countable number of times each year. Their expected weekly load is the annual count multiplied by a standard time per event, divided by the instructional weeks in the year.

The counts come from compliance data the district already holds. The standard times are the uncertain element, and they are the elements that time studies should calibrate.

3. **Recurring work.** Documentation, collaboration, travel between buildings and supervision of assistants recur weekly. Where these are scheduled, the scheduled time is used. Where they are not, the model applies a published or locally measured reserve, stated as a share of capacity, and labels the figure as a reserve rather than an observation.

Indirect work,  $I$ , is the sum of the three channels. The ASHA (2024) survey figure of roughly 6 hours of documentation against 23 hours of direct intervention for full-time clinicians is one empirical anchor for the size of the recurring channel, but it is a national mean and should be replaced by local measurement as soon as possible.

## 5.5 Utilization and Required Staffing

With demand and capacity in the same unit, the provider's utilization is

$$U = (D + I) / C$$

and is reported as a percentage. At 100 percent the mandated and required work exactly fills the contracted week. Above 100 percent, more is required than the week can hold, and the excess is being absorbed somewhere: in unpaid time, in delayed documentation, in shortened sessions or in services not delivered.

At the level of a building or a district, the same quantities answer the staffing question. For a role staffed by service minutes, the full-time equivalents required are

$$FTE_{\text{required}} = \Sigma D / (C \times s \times b)$$

where  $s$  is the share of a provider's week that can be scheduled for direct service once indirect work is reserved, and  $b$  is a planning buffer that holds back a margin for absences, new referrals and the irregular arrival of event-driven work. Both  $s$  and  $b$  are policy parameters. They should be stated on the face of any staffing report, because a higher value of either lowers the number of staff the calculation says are required.

For a role staffed by a population ratio, such as school psychology, the requirement is computed from enrollment and the ratio the district has adopted, with no minutes calculation at all. The two methods are reported side by side and never summed into a single workload figure.

## 5.6 Three States of Every Figure

A workload figure can be in one of three states, and the model reports which. It may be *measured*, when every input is present. It may be *not measurable*, when an input is missing, in which case the model names the input and the action that would supply it, for example linking a building to its contract or stating a service's cycle length. Or it may be *not applicable*, as when a minutes calculation is requested for a ratio-based role. The distinction between the second and third states matters because their remedies differ, and a report that collapses them sends a district to fix the wrong thing.

This principle answers the missing-data gap identified in Section 4.3. It also protects the credibility of the measurement. A district that discovers one fabricated zero will reasonably distrust every other figure in the report.

## 5.7 Applying the Model to the CEC Example

The CEC worked example illustrates both the value of the model and the information it requires. Suppose, as the figures imply, that the example measures each teacher against a gross week of about 2,400 minutes. Now suppose a contract that provides a 30-minute duty-free lunch and 45 minutes of daily protected planning. Those two provisions remove 375 minutes, leaving 2,025 minutes of capacity. Against that denominator Teacher A's 2,550 minutes is about 126 percent of capacity rather than 106 percent, and Teacher B's 1,400 minutes is about 69 percent rather than 58 percent. The ranking of the two teachers does not change, but the severity of Teacher A's position changes considerably, and so does the case a director could make for additional staff. The contract figures here are illustrative, not drawn from any district. The point is that the conclusion depends on them, and the position does not say what they are.

The model would also ask how each teacher's minutes divide between direct and indirect work, whether any of Teacher A's services are delivered in groups, and whether any service lines could not be resolved to a weekly figure. Each answer changes either the figure or the confidence a reader can place in it.

## 5.8 Validity and Reliability

Any measurement model must earn trust through evidence. The model proposed here suggests three lines of validation.

**Content validity.** The components of the model should cover the activities that the field and the law recognize as part of the work. The Illinois and Ohio rules, the CEC and ASHA definitions and the joint AOTA, APTA and ASHA statement provide a basis for expert review of that coverage.

**Criterion validity.** If utilization measures what it claims to, it should predict outcomes that the literature links to workload. Testable hypotheses follow directly: providers with higher measured utilization should report lower workload manageability and higher emotional exhaustion (Bettini et al., 2017; Marante et al., 2023), and buildings with higher mean utilization should show higher rates of provider departure and of services not delivered as mandated.

**Reliability.** The standard times for event-driven work and the reserves for recurring work are the least certain elements. Time studies of the kind conducted by Vannest and Hagan-Burke (2010), combining provider self-recording with observation, are the means of calibrating them. A district can begin with published reserves and replace them with local measurements as they become available, recording which figures are measured and which are reserved.

## 6. Implications for Policy and Practice

### 6.1 The Federal Landscape

Federal law sets no caseload limit. The Wyoming Department of Education stated the point plainly when it issued staffing guidelines for its districts “as the IDEA Amendment of 2004 has no provision governing special education caseloads or class size” (Wyoming Department of Education, 2019). The federal regulations instead require each state to “establish and maintain qualifications to ensure that personnel necessary to carry out the purposes of this part are appropriately and adequately prepared and trained” (34 C.F.R. § 300.156(a)), and require each IEP to state the frequency and duration of services (34 C.F.R. § 300.320(a)(7)). CEC’s observation that “IDEA gives each state the ability to set guidelines for program or service delivery” describes the resulting arrangement (CEC, 2026).

This allocation of authority has a consequence that is easy to miss. The federal government requires districts to record, for every student, the direct-service half of workload in exact terms. It requires nothing about the capacity of the people who deliver it. A federal role in workload measurement need not take the form of a caseload cap, which would conflict with the professional consensus reviewed above. It could take the form of data guidance: technical assistance on how states might collect and report provider capacity and workload alongside the service data they already report.

### 6.2 The State Landscape

States have answered the question in at least four different ways. The examples below are illustrative rather than exhaustive.

**No caseload maximum.** ASHA’s 2025 compilation of state guidance lists Colorado, Massachusetts and Texas, among many others, as having “No minimum or maximum” caseload for school speech-language pathologists (ASHA, 2025). In these states the staffing question is answered entirely at the district level.

**Group-size limits without caseload caps.** Massachusetts regulates instructional groupings rather than caseloads. Its regulations provide, for example, that for groupings outside general education for 60 percent or less of the school day, “group size shall not exceed eight students with a certified special educator” (603 Mass. Code Regs. 28.06(6)(c)). Section 28.06 sets no caseload limit for related service providers.

**Hard caseload caps with variance procedures.** New York sets numerical limits across several service types. For students who need speech and language services, “the total caseload of such students for teachers providing such services shall not exceed 65” (N.Y. Comp. Codes R. & Regs. tit. 8, § 200.6(e)(2)). A consultant teacher’s caseload “shall not exceed 20” (§ 200.6(d)(1)), and a resource room teacher’s caseload “shall not exceed 20 students,” or 25 in grades 7 through 12 (§ 200.6(f)(5)). Several of these limits may be exceeded “Upon application and documented educational justification to the commissioner” (§ 200.6(d)(3)).

**Hybrid rules combining workload and caps.** Illinois and Ohio are the most instructive cases, because each already requires a workload analysis and also sets a ceiling. In Illinois, “Work load limits shall be based on an analysis of the activities for which the entity’s special educators are responsible,” yet “at no time shall the caseload of a speech and language pathologist exceed 60 students” (23 Ill. Admin. Code § 226.735). Ohio’s rule contains a section headed “Service provider workload determination for delivery of services,” which provides that “Workload for an individual service provider will be determined by the following process” and lists the components of workload (Ohio Admin. Code 3301-51-09(I)). The same rule then limits a speech-language pathologist to “Eighty school-age children with disabilities,” or fifty in certain disability categories, and a school psychologist to “One hundred twenty-five school-age children with disabilities” (Ohio Admin. Code 3301-51-09(I)(3)).

The variation is itself a finding. A speech-language pathologist may be limited to 60 students in Illinois, 65 in New York and 80 school-age students in Ohio, and to no state number at all in Colorado or Massachusetts. These figures describe the same role. The difference between them is set by jurisdiction, not by the work.

## 6.3 Implications for State Policy

Three implications follow for states.

First, caseload caps and workload analysis can coexist, but the relationship should be explicit. In the hybrid model, the cap functions as a backstop: it prevents the most extreme assignments regardless of what the workload analysis shows. That is a defensible role. The risk is that the cap becomes the operative standard and the workload analysis a formality. Ohio's own commissioned study found that the state's earlier workload framework existed but was not widely used (Carlin et al., 2013). A state that adopts a hybrid should require that the workload analysis be documented and should allow it to set a lower limit than the cap when the analysis supports one.

Second, states that move toward workload should specify the method, not only the principle. At a minimum that means defining capacity by reference to the contracted week less contractual protections, defining how mandates are converted to weekly minutes, and requiring that missing inputs be reported rather than defaulted. Without these, a state rule that requires "workload analysis" can be satisfied by calculations that are not comparable from one district to the next.

Third, states with no maximum should not read the absence as neutrality. In those states the only standard is whatever each district chooses. Guidance on workload measurement, even without a binding limit, would give districts a common language and give the state a way to see where capacity is failing.

## 6.4 Implications for District Practice

For a director of special education, the CEC position and the model above suggest a practical sequence.

1. **Read capacity from contracts.** For every building and role, record contracted hours and days, lunch, protected planning and non-instructional duties. This is the denominator, and it is usually already written down.
2. **Resolve every service line to weekly minutes.** Identify services whose frequency or cycle cannot be resolved and correct them at their source, in the IEP, rather than in a spreadsheet.
3. **Record how services are actually grouped.** Where grouping is unknown, report the assumption.
4. **Count event-driven work from compliance data.** Evaluation and meeting counts are already tracked; attach a standard time to each and begin calibrating it.
5. **Report utilization by provider, with its state.** Distinguish measured figures from figures that cannot yet be computed, and say why.
6. **Use the results in staffing and budget decisions.** A request for an additional position supported by measured utilization is a different conversation from one supported by a

sense that staff are stretched.

Two cautions apply. First, workload measurement is not surveillance. Its purpose is to describe the demands placed on a role, not to audit how an individual spends each minute, and districts should say so in writing to staff and, where applicable, to bargaining units. Second, a workload figure is a planning tool, not a guarantee of service. A provider at 80 percent utilization may still miss sessions for reasons the model does not capture. Measurement narrows uncertainty; it does not remove the need for professional judgment.

## 6.5 Implications for Professional Associations

CEC's position creates an opportunity for coordination. ASHA, AOTA and APTA have already issued joint guidance for related service providers, and NASP has its own ratio standard. A shared technical specification across these associations, defining capacity, mandate conversion, indirect categories and reporting states, would allow a district to measure every role on one consistent basis while respecting the differences between roles. CEC's recommendation to "Prioritize Data-Driven Decision-Making" (CEC, 2026) would be strengthened by a data standard to support it.

## 6.6 Implications for Research

The literature supports workload as a predictor of exhaustion and intent to leave, but it offers little evidence on the effects of staffing to workload. Four lines of research would address that gap: time studies that calibrate standard times for indirect work across roles and settings; validation studies testing whether measured utilization predicts self-reported manageability, burnout and departure; quasi-experimental comparisons of districts or states that adopt workload methods with those that do not, examining retention, service delivery and placement outcomes; and studies of how workload measurement affects decisions about the least restrictive environment, a question that connects workforce capacity to the core purpose of IDEA.

# 7. Limitations

This paper has several limitations, which apply both to its analysis of the CEC position and to the model it proposes.

First, the paper analyzes a position statement, not a program. CEC's statement is short by design, and some of the gaps identified here may be addressed in guidance that accompanies or follows it. The analysis is limited to the text of the statement approved in July 2026.

Second, the measurement model is conceptual. It has not been validated against time studies, burnout measures or retention outcomes, and the validation agenda in Section 5.8 describes work still to be done. Several parameters, including the standard times for event-driven work, the reserve for recurring indirect work, the schedulable share of capacity and the planning buffer, are policy choices or empirical quantities that are not yet well estimated. Results will be sensitive to them.

Third, the model depends on data quality. A model that refuses to compute when inputs are missing is more honest than one that defaults, but in districts with incomplete data it will report many figures as not measurable. That is a correct description of what the district knows, but it may slow adoption.

Fourth, the research base reviewed here has its own limits. Much of it is cross-sectional. The strongest predictive finding for speech-language pathologists comes from a survey conducted during the COVID-19 pandemic (Marante et al., 2023). The only study comparing workload and caseload approaches directly involved seven clinicians (Carlin, 2024). The state rules reviewed are a sample chosen to illustrate the range of approaches, not a census.

Fifth, the author's prior research, which informs the conceptual framework, was a qualitative study of ten administrators in one district (Oxford, 2020). It describes that district in depth and was not designed to generalize. The link it suggests between belief, practice and capacity is treated here as a hypothesis.

Finally, the author has a commercial interest in workload measurement, disclosed in the author note. The model is presented in terms that any district or vendor could implement, and readers should weigh its claims on the evidence offered.

## 8. Conclusion

The Council for Exceptional Children's 2026 position is a significant statement. It brings special education teachers into a consensus that the related service professions reached more than two decades ago: a count of students is not a measure of work, and the field should staff to workload. The research reviewed here supports that direction. Workload manageability predicts emotional exhaustion and intentions to leave, special educators leave their positions at high rates, and each departure carries costs that districts pay without seeing them traced to their cause.

The position's gap is not one of direction but of definition. A workload figure means nothing until its capacity is stated, its conversion of mandates to weekly minutes is specified, its treatment of indirect work is explicit and its handling of missing data is honest. The position's own example shows why: two percentages, offered as the clearest proof that caseload misleads, are percentages of an unstated week. This paper has proposed a model

that fills that gap with the elements the field has already named. It measures demand and capacity in the same unit, at the provider-week, from the IEP mandates and the contracts that districts already hold, and it reports what it cannot compute rather than guessing.

Federal law leaves caseload to the states, and the states have answered in incompatible ways. A speech-language pathologist's permitted load changes at the state line, while the work does not. The move from caseload to workload is an opportunity to replace that variation with a common method. The method need not be the one proposed here. It does need to be specified, tested and shared, so that the next director who asks whether an educator is full can answer with a measurement rather than a count.

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