



INTERACTIVE INSTITUTE **2021**
BUILDING AND SUSTAINING A CULTURE OF HIGH-QUALITY DATA

Supporting Districts Identified With Significant Disproportionality: States Tell Their Stories

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Agenda

- State supports
 - Determining the factors contributing to significant disproportionality
 - Implementing Comprehensive Coordinated Early Intervening Services (CCEIS)
 - Collecting and reporting CCEIS fiscal and student data
- State stories
 - Kentucky Department of Education
 - Michigan Department of Education

State Supports: Determining the Factors Contributing to Significant Disproportionality



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Districts With Significant Disproportionality Must...

Identify and address the factors contributing to that significant disproportionality

- What are some of those factors?

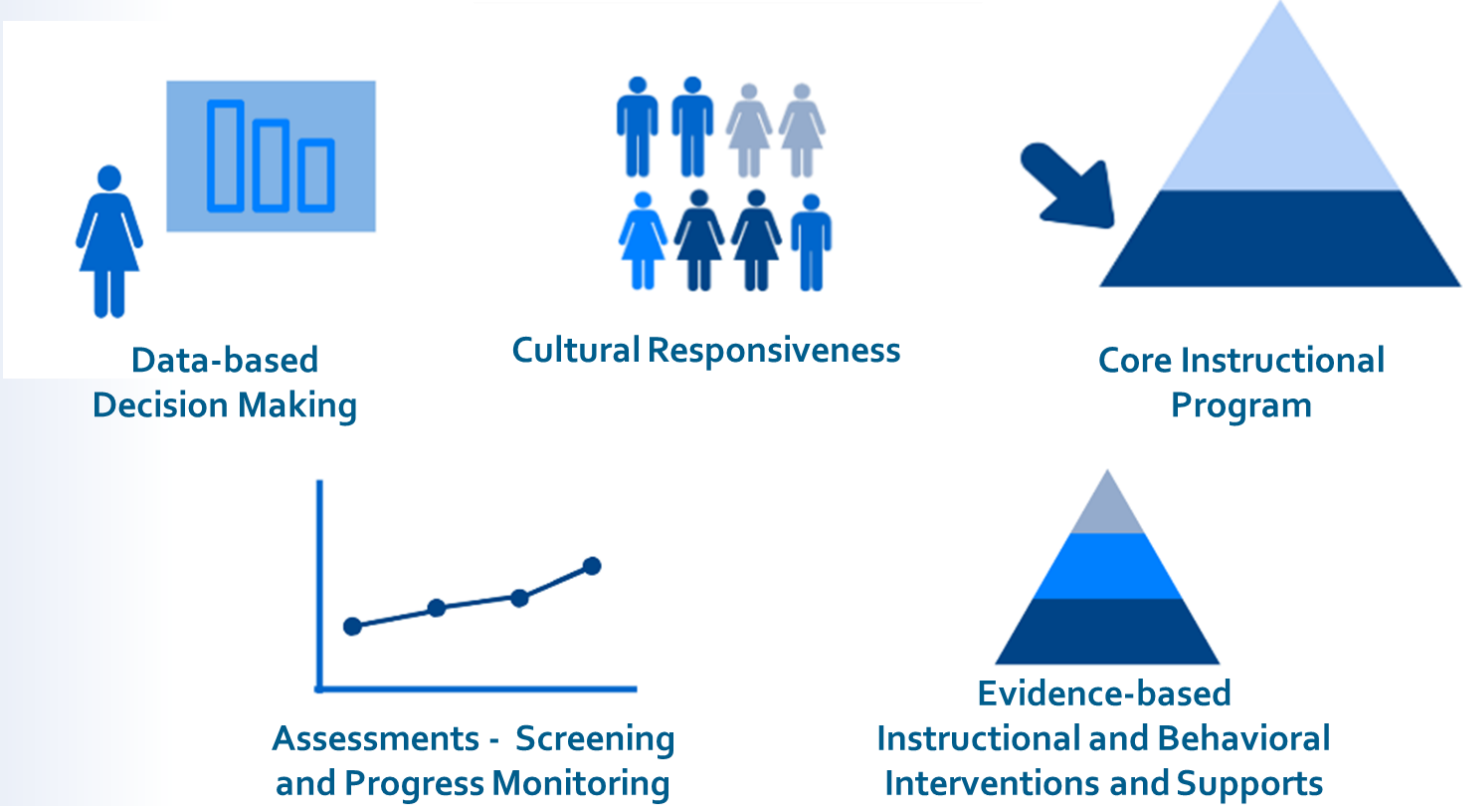
Some Sample Factors From Regulation

- “a lack of access to scientifically based instruction;
- economic, cultural, or linguistic barriers to appropriate identification or placement in particular educational settings;
- inappropriate use of disciplinary removals;
- lack of access to appropriate diagnostic screenings;
- differences in academic achievement levels; and
- policies, practices, or procedures that contribute to the significant disproportionality.” [34 CFR §300.646]

Success Gaps Analysis: Two Underlying Claims

1. Significant disproportionality happens when a group of students doesn't receive everything it needs from the schooling system
2. Equity, inclusion, and opportunity can lessen success gaps between groups of students

What Do Children Need From Their School System?



Addressing Significant Disproportionality

1. Name the significant disproportionality
2. Build a team
3. Identify root causes and complete file reviews
4. Develop an action plan
5. Implement your plan, monitor progress, report, and adjust

Want More Help With This Process?

- IDC's *Success Gaps Toolkit*
 - <https://ideadata.org/resources/resource/1538/success-gaps-toolkit>
- IDC State Liaisons
 - <https://ideadata.org/technical-assistance>

State Supports: Implementing CCEIS



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Start With a Plan

- Provide a template for LEAs to use for CCEIS plan
- Guide the LEAs through the completion of the plan
- Encourage LEAs to align activities related to the factors contributing to significant disproportionality
- Monitor LEAs implementation of activities outlined in the CCEIS plan
- Build in evaluation of activities

Sample CCEIS Plan Formats

- Fillable document with several components
- CCEIS student and fiscal reporting form
- Integrated into fiscal database
- Integrated into the LEA monitoring process

Sample CCEIS Plan Components

- Area(s) identified with significant disproportionality (e.g. identification, placement, discipline)
- Contributing factor(s)
- Information LEA used to determine contributing factors
- Planned activities
- Target demographic per activity
- Number of students that received CCEIS by activity or location
- Amount of funds reserved and expended by activity
- Evaluation
- State review process

Discussion: What format do you require LEAs to use to submit CCEIS information?

We provide excel templates

Louisiana requires school systems to enter CCEIS information into our Grants Management System (eGMS). Their budget application cannot be accepted without this information.

We use a fillable form plus the same budget information we require for all federal funds

NC requires districts to enter their CCEIS plans within their IDEA VI-B funding application

Discussion: What additional information do you require from LEAs implementing CCEIS?

Michigan requires a program design, a rationale for student selection and robust root cause analysis

We also have them conduct a root cause analysis, report activities, evaluations, etc.

Root cause analysis, planned response activities, methods of evaluation

State Supports: Collecting and Reporting CCEIS Fiscal and Student Data



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Accountability

- Establishing a clear process and standardized documentation will enable both LEA and state staff to track and report both fiscal and student CCEIS data
- Developing standard data collection forms and tools may facilitate more consistent and reliable data reporting

Who May Receive CCEIS?

An LEA may use funds reserved for CCEIS

- To serve children from age 3 through grade 12
- Particularly, but not exclusively, for children in those groups that were significantly over-represented
- Including children not currently identified as needing special education or related services but who need additional academic and behavioral support to succeed in a general education environment and children with disabilities.

(See 34 CFR §300.646(d)(2).)

Collecting Student Data: How to Help LEAs Determine Which Students

- Identify policies, procedures, or practices that may need revising
- Identify the factors (root causes) that contributed to the significant disproportionality
- Develop a CCEIS plan that will address the root causes and policies, procedures, and practices as appropriate
- Based in the CCEIS, determine which students may
 - Be part of the group of students that were significantly overidentified and/or
 - Need the additional academic and behavioral supports as planned for in the CCEIS plan

Let's Look at an Example

- District has significant disproportionality in placing students in separate schools and residential placements
 - Root causes were: placements are mostly autism and EBD who are in a separate school/residential setting; staff are not trained or prepared for severe behavioral challenges; staff are not trained in trauma based practices; there's lack of parental training and support, and others
 - District plans to incorporate PBIS/ECPBIS in two schools; training Autism and BD aides with BCBA support, get ABA training for all autism staff
 - At-risk students could be defined by the district as:
 - Children in the two schools who have more than XX Office discipline referrals
 - Children in autism program who have not responded to traditional instruction for at least XX weeks

Positive Behavior Intervention and Supports (PBIS), Early Childhood PBIS (ECPBIS), Behavior disorder (BD), Board Certified Behavior Analyst (BCBA), Applied Behavior Analyst (ABA)

State Stories: Kentucky Department of Education



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Comprehensive Coordinated Early Intervening Services (CCEIS) Implementation

Kentucky Department of Education



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CCEIS in Kentucky



- 2020–21
 - 15 total districts out of 171 in state
 - 12 districts identified using alternate risk ratio (primarily eastern Kentucky)
 - All districts identified as *intellectual disabilities* (White) or *speech or language impairment* (White)
 - 3 districts identified using risk ratio
 - All districts identified in behavior categories (Black)

CCEIS in Kentucky (cont.)



- Partnership with IDC
 - Began in 2018 with training of CCEIS districts using *Success Gaps Toolkit* required for all districts
 - Training held annually since that time
 - Virtual training in 2020 due to COVID

CCEIS in Kentucky (cont.)



- CCEIS requirement overhaul in 2020
 - Multi-pronged support system
 - Kentucky Department of Education (KDE)
 - Consultant for CEIS/CCEIS
 - Kentucky Academic & Behavioral Response and Intervention (KY-ABRI)
 - IDC
 - Local special educational cooperatives

CCEIS in Kentucky (cont.)

- CCEIS requirement overhaul in 2020
 - Three phase system
 - Phase One
 - Phase Two
 - Phase Three



CCEIS in Kentucky (cont.)



- Phase One

- Step One: [2021–22 Significant Disproportionality - Assurance of Compliance](#)
- Step Two:
 - Identify district CCEIS contact(s)
 - **New to CCEIS districts only** participate in webinar on intro to significant disproportionality
- Step Three: Convene a Leadership Team

CCEIS in Kentucky (cont.)



- Phase One, Step Two
 - Participate in required KDE CCEIS training
 - IDC Success Gaps Rubric training
 - District representatives to be trained must include a core group of at least three district administrative staff representing the following areas
 - Special education
 - Instruction (for districts identified for significant disproportionality in a special education [SPED] identification area)
 - Behavior (for districts identified in a SPED behavior area)

CCEIS in Kentucky (cont.)



- Phase Two, Step One
 - After IDC training
 - Return to district and convene the CCEIS Stakeholder Team
 - Conduct “Success Gaps” training with the team
 - Begin process to discuss and complete Success Gaps Rubric
 - Gather relevant data and determine gaps in data
 - Analyze data related to significant disproportionality
 - Determine “target group” for CCEIS implementation
 - Review district policies and practices for effects on significant disproportionality
 - *Experienced Districts* complete the District Initiative Inventory

CCEIS in Kentucky (cont.)



- Phase Two, Step Two
 - After IDC training
 - District Leadership Team and Stakeholder Team complete required CCEIS planning items
 - Complete CCEIS-Improvement Plan (CCEIS-IP)
 - Complete “August-September” & “October-December” portion of the CCEIS Strategic Quarterly Plan (CCEIS-SQP)
 - Prepare and complete CCEIS budget and submit for approval in GMAP using the 2020-21 KDE CCEIS Spending Matrix.
 - Create CCEIS Flag in Infinite Campus & Set-up CCEIS Reporting Ad-Hoc

CCEIS in Kentucky (cont.)



- Phase Two, Step Three
 - Submit all required documentation via the GMAP application
 1. CCEIS-IP including *Success Gaps Rubric* self-assessment with evidence
 2. CCEIS-SQP
 3. CCEIS Budget
 4. *Experienced Districts* submit CCEIS Initiative Inventory

CCEIS in Kentucky (cont.)



- Phase Three
 - Placed each group into cadres based on identification, size, and geographic location
 - Operated like professional learning communities
 - Meet virtually quarterly and must bring data to the meeting
 - Sharing and feedback from other districts throughout the process
 - Currently scheduled for one and a half hours each quarter

CCEIS in Kentucky (cont.)



- Phase Three (cont.)
 - Required to submit quarterly
 - CCEIS Strategic Quarterly Reports which include
 - Copies of all policies, practices and procedures amended during the period
 - Recap of all CCEIS implementation activities
 - Recap of special education data including students who enter and exit their area of significant disproportionality identification or for behavior identified districts, an analysis of behavior resolutions in their identified area

CCEIS in Kentucky (cont.)



- Phase Three (cont.)
 - Required to submit quarterly
 - CCEIS Strategic Quarterly Reports which include
 - Recap and minutes of stakeholder meetings and activities
 - Full expenditure reports of CCEIS monies from the prior quarter aligned with identified CCEIS activities

CCEIS in Kentucky (cont.)



- Phase Three (cont.)
 - One-on-one consultation/data meetings with districts
 - Districts may use the Bookings app to schedule a technical assistance meeting at any time available
 - Meet with each district at least once per semester to discuss progress and address questions or concerns

CCEIS in Kentucky (cont.)



- Phase Three (cont.)
 - Each district completes end-of-year requirements
 - CCEIS End of Year (CCEIS EOY) Report
 - IDC *Success Gaps Rubric* End-of-Year Self-Evaluation

CCEIS in Kentucky (cont.)



- 2021–22 at a glance
 - Two long term CCEIS districts exiting
 - One fell under 3.0 risk ratio minimum
 - One met reasonable progress standard of .05 decrease over the past two years and will “temporarily” exit

CCEIS in Kentucky (cont.)



- 2021-22 at a glance (cont.)
 - Training of special education cooperatives to better support CCEIS implementation
 - Expansion of quarterly CCEIS cadre meetings to half day with a training component for each meeting targeted to each group
 - Targeted training for the eastern part of the state for due process and identification
 - 83% of identified districts for 21–22 are in eastern Kentucky and identified with alternate risk ratio (White) in some area

Questions for Kentucky



State Stories: Michigan's Approach to Significant Disproportionality



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Michigan's Story

- Significant disproportionality in Michigan
- Response plan
- Comprehensive Coordinated Early Intervening Services (CCEIS) program design

Significant Disproportionality Methodology in Michigan



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The purpose of the federal regulations is to promote equity in *Individuals with Disabilities Education Act (IDEA)*.

Specifically, the regulations are intended to ensure States meaningfully identify ISDs with significant disproportionality and States assist ISDs in ensuring children with disabilities are properly identified for services, receive necessary services in the least restrictive environment, and are not disproportionately removed from their educational placements for disciplinary reasons.

These regulations also address the well-documented and detrimental over-identification of certain students for special education services with concern that over-identification results in children being placed in more restrictive environments and not being taught to challenging academic standards.

ISDs are legally obligated to work with member districts to ensure appropriate identification of students with disabilities and provide the resources and supports they need to have equal access to education.

Thus, States are encouraged to ensure the ISDs' Child Find policies, procedures, and practices, are working effectively to identify all children with disabilities, regardless of race or ethnicity.



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Michigan's Methodology

- Calculations at the intermediate school district (ISD) level
- Over-identification and discipline population 3-21 years of age
- Educational settings population age 5 in kindergarten -21 years of age
- Use risk or alternate risk ratio
- Comprehensive CEIS must identify and address the factors contributing to the significant disproportionality

Michigan's Methodology (cont.)

- If identified with significant disproportionality, CCEIS for ages 3 through grade 12 for students with and without disabilities
- 2 years of data for all areas (discipline, identification & educational settings)
- Minimum cell size of 10 (numerator) for each race/ethnicity group
Minimum 'n' size (denominator) of 30
- A risk ratio greater than 3.0 in all areas (discipline, identification & educational settings) for two consecutive years
- Reasonable progress

Michigan's Tiered Levels of Response



Tier 0: Universal

If an ISD has not exceeded the risk ratio threshold in discipline, identification, or educational settings, for two consecutive years, they are not considered at risk. However, if the ISD or any of the member districts have exceeded the risk ratio threshold for one year or have a risk ratio between 2.0 and 2.99, proactive measures should be taken to ensure the ISD, and member districts are paying attention to their procedures and practices to ensure they will not become At Risk of identification of Significant Disproportionality.

The Office of Special Education Response

- The Office of Special Education (OSE) will provide guidance documentation which will be made available to all ISDs and access to Wayne State University website to review aggregate and member district-level data.

Material is available at: <https://training.catamaran.partners/>



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Michigan's Tiered Levels of Response (cont.)



Tier I: At-Risk

ISDs meeting one of the following criteria are considered “At Risk” but are **not** identified for significant disproportionality.

- An ISD has exceeded the threshold of 3.0 for two consecutive years but within the ISD there are no member districts exceeding the threshold in the **same areas** of the ISD **OR**
- An ISD and/or its member districts have demonstrated “reasonable progress.” The OSE has defined “reasonable progress” to mean a year-to-year decline in risk ratio of at least 0.2 in each of the two consecutive years (with data) for the ISD and/or the member districts exceeded the 3.0 threshold.

The Office of Special Education Response

- The OSE will provide guidance documentation to all ISDs. Additional technical assistance is available from the OSE upon request for ISDs considered At Risk to help review and analyze data and to provide additional assistance to decrease the ISD and member district risk ratios.

Material is available at: <https://training.catamaran.partners/>



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Michigan's Tiered Levels of Response (cont.)

Tier II: Moderately At-Risk

ISDs meeting the following criteria are in Tier II. These ISDs are considered “Moderately At Risk” but are **not** identified for significant disproportionality.

- An ISD with a risk ratio greater than 3.0 AND more than zero but 1/3 or less of member districts within the ISD have risk ratios greater than 3.0

Note: the one-third of member districts per ISD is based on a single area of identification (i.e. discipline, over-identification, or educational environments). If a member district exceeds the 3.0 risk ratio in multiple areas, the member district is only counted once in determining the 1/3 or less of member districts. For purposes of identification and educational placement, risk ratio is attributed to resident district and not the ISD.

Response Plan for ISDs Moderately At-Risk for Significant Disproportionality



The ISDs that the Office of Special Education (OSE) identified as moderately at risk for being identified with significant disproportionality must complete and submit a Response Plan in Catamaran.

The Michigan Department of Education (MDE), OSE must approve the Response Plan in Catamaran by the prior to program implementation.



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Response Plan for ISDs Moderately At-Risk for Significant Disproportionality

Components

- Response Plan Team
- Data Use and Root Cause
- Identified areas for improvement including specific student populations
- Strategies
- Targeted Areas (race/ethnicity, disability area, member district(s))
- Response Plan Design with specific activities
- Progress Reports
- Data
- Professional Development
- MDE Comments on the Response Plan



Michigan's Tiered Levels of Response

Tier III: Identified for Disproportionality

ISDs meeting one of the following criteria are in Tier III. These ISDs are identified for significant disproportionality. Tier III includes all ISDs not meeting the criteria for Tiers 0, I, or II.

- Any ISD with a risk ratio greater than 3.0 AND not making “reasonable progress” as defined in Tier I OR
- Any ISD with a risk ratio greater than 3.0 AND greater than 1/3 of their member districts with risk ratios greater than 3.0

Tier III: Identified for Disproportionality

When an ISD is in Tier III, the ISD must

- Provide for the review (and if appropriate) revision of the policies, procedures, and practices for compliance with IDEA **AND**
- Reserve the maximum amount (15 percent) of its IDEA Part B funds to be used for CCEIS to serve children, particularly, but not exclusively, children in those groups that were significantly over-identified **AND**
- Publicly report on the revision of its policies, procedures, and practices.

Tier III: Identified for Disproportionality (cont.)

Office of Special Education Response

Regulation 34 CFR §300.646 of the Individuals with Disability Education Act (IDEA) requires ISDs must

- Allocate 15% of IDEA Special Education (Part B, Section 611) Flow-Through Grant
- Review/Revision of Policies, Practices and Procedures
- Publicly Report Revisions of Policies, Practices, and Procedures

Comprehensive Coordinated Early Intervening Services Program Design



ISDs identified with significant disproportionality are required to use 15 percent of the ISD IDEA Part B allocation for CCEIS in order to reduce the identified areas of significant disproportionality.

Components

- Funding—15%
- Disproportionality data (prepopulated by the Office of Special Education)
- Root cause analysis (provide recommended tools to accomplish this task)
- Examination checklist (district policies/procedures, building polices/procedures, student referral data, documentation of professional learning, evidence of implementation with fidelity, eligibility reports, individualized education program [IEP] documentation, behavior reports, etc.)



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Comprehensive Coordinated Early Intervening Services Program Design (cont.)

- Analysis of data dive
- Identified areas for improvement
- Description of activities/programs to use with specific member districts
- Evidence to use for progress reports
- Data for short- and long-term progress
- Professional development needs
- List of member districts participating in the program(s)

Comprehensive Coordinated Early Intervening Services Program Design (cont.)

- Rationale for the identified member district(s)
- Student selection and rationale
- Detailed program design
- Scientifically based evidence of why the program was chosen and meets the requirements for CCEIS
- Budget Information
- Supplies

Questions for Michigan



PADLET

- How does your state collect LEA CCEIS fiscal and student data?
- How does your state monitor implementation of CCEIS?
- What challenges do you face as an SEA in collecting CCEIS data from LEAs?

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