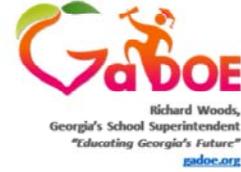


Hello, My name is Dr. Jasolyn Henderson, and I am an Education Program Specialist for the Georgia Department of Education. I am going to provide guidance about Georgia's Corrective Action Plan or CAP, specifically as it relates to Disproportionality Determinations and Noncompliance findings. Using this module as technical assistance, most questions related to developing a CAP should be answered.

Disproportionality Determinations



- Significant Disproportionality
 - Identification, Discipline and/or Placement
- Disproportionate Representation
 - Over-identification
- Significant Discrepancy for Discipline of SWDs
 - All SWDs
 - SWDs by Race/Ethnicity

An LEA can receive disproportionality determinations for one or more areas: Significant Disproportionality, Disproportionate Representation and/or Significant Discrepancy....

Review of Policies, Procedures and Practices



Disproportionality Compliance Review Focus Areas

- Focus Area I: School-wide Approaches and Prereferral Interventions
- Focus Area II: Child Find
- Focus Area III: Evaluation/Reevaluation
- Focus Area IV: Eligibility Determination
- Focus Area V: Discipline

The Disproportionality Compliance Review is administered to LEAs as a way to review of policies, procedures, and practices that may be contributing to disproportionality. The protocol contains 5 focus areas in which a LEA can be found to have noncompliant policies, procedures, and or practices. **Your district completed specific focus areas relative to the identified area of disproportionality.**

Sample Feedback



Disproportionality Monitoring Feedback Document and
Corrective Action Plan (CAP)
2015 – 2016 School Year

District Name:
Determination Area(s):

The table below includes the individual indicators identified as noncompliant based on the State's review of district policies, procedures, and practices. These areas must be addressed in the district's Corrective Action Plan (CAP) and timely corrected, as soon as possible, but no later than one year from this notification.

Focus Areas	Noncompliant Indicator(s)
<p>I. School-wide Approaches and Pre-referral Interventions</p>	<p>2. The district provides high quality, sustained professional learning activities on the written procedures for appropriate district and school personnel to assist with the implementation of the Student Support Team (SST Rule) 160-4-2-.32.</p> <p>5. The district provides prereferral interventions that are equitable by type, degree and frequency across all racial/ethnic groups.</p> <p>Comments to assist with CAP development:</p> <ul style="list-style-type: none"> • Implement training on the procedures for SST (specifically at the MS/HS levels) • Show use of evidence-based, research-based, or scientific interventions which includes progress monitoring tools and data (specifically at the MS/HS levels)

GaDOE reviewed your Disproportionality Compliance Review and supporting documentation and evidence. This information was used to determine whether your district had noncompliant policies, procedures, and/or practices. As there is no threshold for noncompliance, a finding in 1 or more areas would constitute corrective actions. Information regarding specific noncompliance findings was included in your notification letter. An example is displayed on the screen.

Disproportionality and Noncompliance



- This noncompliance must be corrected, as soon as possible, but no later than one year from this notification.
- The corrective actions for the noncompliant areas must be addressed in a Corrective Action Plan (CAP).

If it is determined that a district has noncompliant policies, procedures and/or practices, this noncompliance must be corrected, as soon as possible, but no later than one year from notification.

Disproportionality Compliance Review



Richard Woods,
Georgia's School Superintendent
"Educating Georgia's Future"
gadoe.org

- First 4 questions in each area are the components of general supervision

Child Find Procedures Georgia Rule Number 160-4-7-.03 (Child Find)	Rate Your Compliance	
	Yes	No
1. The district has written procedures for implementation of the Child Find Rule .	<input type="checkbox"/>	<input type="checkbox"/>
2. The district provides high quality, sustained professional learning activities on the written procedures for appropriate district and school personnel to assist with the implementation of the Child Find Rule .	<input type="checkbox"/>	<input type="checkbox"/>
5. The district publishes annual notice of any significant activity that is designed to identify, locate or evaluate children using some type of media to publicly notify parents.	<input type="checkbox"/>	<input type="checkbox"/>
6. The district provides screening and evaluation of all children with suspected disabilities birth through age 21. Please note the Child Find Rule for specific reference such as the referring children birth through the age three to the Babies Can't Wait early intention program.	<input type="checkbox"/>	<input type="checkbox"/>
7. The district has a practical method to determine which children are currently receiving special education and related services.	<input type="checkbox"/>	<input type="checkbox"/>
8. The district provides student referrals that are accompanied by documentation of scientific, research or evidence based academic and/or behavioral interventions that have been implemented as designed for the appropriate period of time to show effect or lack of effect that demonstrates the child is not making sufficient rate of progress to meet age or State-approved, grade-level standards within a reasonable time frame. *See Rule for exclusions	<input type="checkbox"/>	<input type="checkbox"/>

Ensuring that IDEA is being implemented in a compliant way is not only required but also what is best for students and families. If there are issues of noncompliant practices in a district, it is highly likely that one or more of the components of general supervision are not in place. These components are necessary for the compliant implementation of IDEA. As a result, GaDOE has placed a very strong emphasis on the importance of effective general supervision. This can be seen throughout the Disproportionality Compliance Review. For example, this is Focus Area II. The first four questions of each focus area are the components of General Supervision. The remaining question are specific practices for that particular area. If all of the components of general supervision are in place, in general, there should be evidence and documentation of compliant practices.



Richard Woods,
Georgia's School Superintendent
"Educating Georgia's Future"
gadoe.org

Corrective Action Plan (CAP)

District Name: _____
School Year: _____

The purpose for completing the Corrective Action Plan is to identify actions that the district will take to correct the findings of noncompliance.

Directions: This document is a planning tool used to address noncompliance. The district must submit data in a timely manner to ensure verification of correction no later than one year from notification of noncompliance. If additional areas of noncompliance are identified using other aspects of the General Supervision Systems, then the district must update the document to maintain a comprehensive CAP.

Submission Due Dates:
Compliance Review Date (Prong 1): _____
Date All Corrective Activities Submitted (Prong 2): _____
Deadline for verification and correction (1 year due date): _____

Name (Title) of person responsible for CAP: _____
Email: _____ **Phone:** _____

1. What is the area of noncompliance?

2. What General Supervision System was used to identify this noncompliance?

3. Briefly describe the finding of noncompliance (e.g., level, nature, etc.).

4. Briefly describe the root cause of the noncompliance.

5. List the corrective action planning members below.

Stakeholder Name	Position

Once you have been notified that you have noncompliance, the district must submit a corrective action plan or CAP to GaDOE. Let's look at the CAP template. Please pay special attention to these directions. Note that Districts are required to provide Prong 1 and Prong 2 data and all corrective actions must be completed no later than 1 year after notification which is verification date. Additional guidance will be given in a later slide on Prong 1 and Prong 2 data submissions. PLEASE NOTE---Reviews of student records are required for clearance of noncompliance.

Next Section: Please include contact information for person who is responsible for CAP completion and answer the questions that follow.

1. What is the area of noncompliance? However, if you have disproportionality related to Identification and Disproportionate Representation you would indicate Indicator 9 & 10, if you have disproportionality related to Significant Discrepancy you if you have disproportionality related to placement you would select Indicator 5. If you have a Significant Disproportionality Discipline determination, please leave this item blank.

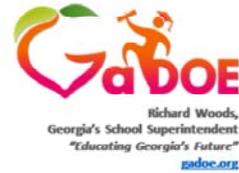
Question 2, you would indicate "Disproportionality Compliance Review"

Question 3. Briefly describe the finding of noncompliance: For example, noncompliance was identified related to the identification process, specifically SST and child find procedures.

Question 4. Briefly describe the root cause of the noncompliance. One way to obtain this information is to conduct a root cause analysis. RCA tries to solve problems by attempting to identify and correct the root causes of events, as opposed to simply addressing their symptoms.

Question 5. List the corrective action planning members.

Prong 1 and 2



- Prong 1 data were the folders that were reviewed as part of the Disproportionality Compliance Review. Submission date for Prong 1 is the date of the Disproportionality meeting that your district participated in.
- Prong 2 submission date-GaDOE will request records to verify compliance which has to be well within 1 year of the notification. **GaDOE will conduct reviews of student records to ensure correction of noncompliance.**

Submission of student records are Prong 1 and Prong 2 data requirements. Prong 1 data were the folders that were reviewed as part of the Disproportionality Compliance Review.. Therefore, the submission date for Prong 1 is the date of the **onsite verification visit or conference call that was held with GaDOE**. Prong 2 submission date-Is the date that GaDOE will request records to verify compliance which has to be well within 1 year of the notification. please note that--- **GaDOE will conduct reviews of student records to ensure correction of noncompliance.**



*Disproportionality Monitoring Feedback Document and
Corrective Action Plan (CAP)
2015 – 2016 School Year*

District Name:
Determination Area(s):

The table below includes the individual indicators identified as noncompliant based on the State's review of district policies, procedures, and practices. These areas must be addressed in the district's Corrective Action Plan (CAP) and timely corrected, as soon as possible, but no later than one year from this notification.

<i>Focus Areas</i>	<i>Noncompliant Indicator(s)</i>
<i>I. School-wide Approaches and Pre-referral Interventions</i>	2. The district provides high quality, sustained professional learning activities on the written procedures for appropriate district and school personnel to assist with the implementation of the Student Support Team (SST Rule) 160-4-2-.32. 5. The district provides prereferral interventions that are equitable by type, degree and frequency across all racial/ethnic groups. <u>Comments to assist with CAP development:</u> <ul style="list-style-type: none"> • Implement training on the procedures for SST (specifically at the MS/HS levels) • Show use of evidence-based, research-based, or scientific interventions which includes progress monitoring tools and data (specifically at the MS/HS levels)

So let's take a look at a sample noncompliance finding and CAP. District ABC has a determination in Discipline: The findings are related to School wide approaches/Prereferral Interventions and Discipline. Specifically the following components of General Supervision: professional learning and the use of prereferral interventions

<p align="center"><i>Corrective Action Steps</i></p> <p><i>How will you ensure correction for each individual case of noncompliance and specific regulatory requirements?</i></p>	<p align="center"><i>Timelines for Completion</i></p> <p><i>When will you complete these action steps?</i></p>	<p align="center"><i>Evidence of Correction</i></p> <p><i>What documentation will you submit to the State to verify completion and correction of noncompliance (e.g., policies, procedures, practices, student records, etc.)?</i></p>
<p>Focus Area and Noncompliance: School-wide Approaches and Prereferral Interventions, Indicator 2. The district provides high quality, sustained professional learning activities on the written procedures for appropriate district and school personnel to assist with the implementation of this Georgia Rule. Corrective Action: Provide system wide PL for administrators, teachers, and support staff.</p>	<p>August 2015</p>	<p>RTI (including SST) Procedural Manual</p> <p>PL Calendar</p> <p>Content (i.e., materials and resources), Sign-In Sheets, and Agenda(s) for PL</p> <p>20 Student Records(i.e., SST folders, Initial referral records, special education records)</p>
<p>Focus Area and Noncompliance: School-wide Approaches and Prereferral Interventions, Indicator 5. The district provides prereferral interventions that are equitable by type, degree and frequency across all racial/ethnic groups. Corrective Action: Provide evidence based interventions to all students</p>	<p>August 2016-March 2016</p>	<p>20 Student Records(i.e., SST folders, Initial referral records, special education eligibility reports)</p>

It is important that your CAP clearly demonstrate how your noncompliance finding and corrective actions are aligned. Let’s look at this CAP. This district has a citation related to the School wide Approaches and Prereferral Interventions Indicator for not providing sustained, high quality PL. In efforts to address this citation, the district will provide PL related to their specific RTI/SST procedures. Evidence of correction is an updated procedural manual, PL calendar, Content which includes power points, resources, and any other materials used for the PL. and of course reviewing student records to ensure that the procedures are being implemented. Remember, District ABC also had a specific citing related to ensuring that the district provides prereferral interventions that are equitable by type, degree and frequency across all racial/ethnic groups. Although we don’t have a specific activity that addresses this citation, this citation must also be corrected. As a part of your procedures, Professional Learning, and supervision and monitoring this needs to be address. How will you and we know that prereferral interventions are equitable across all racial/ethnic groups, by reviewing student records. All students should have equal access to evidence based interventions implemented with high fidelity. It shouldn’t be dependent on what school you go to or whose class you are in. A representative sampling of records from across your school district should be able to demonstrate that this is happening. Also please note the time frame of the proposed activities- District ABC estimated that it would take them a approximately 1 month to complete the initial training. **Now remember, there has to be high quality and sustained professional learning activities. How will you sustain PL activities? Please specify how this is happening in the documentation that is submitted to verify activity.**

Monitoring Progress



- The GaDOE will be frequently monitoring progress towards completion of the CAP activities.
- GaDOE recommends that procedures are developed within 30-60 days of notification.
- GaDOE will be contacting you to schedule submission of records to verify compliance.

Questions and Comments



Jasolyn Henderson, Ph.D., NCSP
Georgia Department of Education

Program Specialist

(404) 463-3597 Office

jhenderson@doe.k12.ga.us

<http://www.gadoe.org>

For any questions related to the content of this webinar, please contact Dr. Jasolyn Henderson at the Georgia Department of Education.