# Guidance Document for Compliance and Improvement Monitoring (CIM) for Significant Disproportionality (Sig Dis)

This guidance document should be used by Local Educational Agencies (LEAs) identified as Significantly Disproportionate (Sig Dis) to support the development of the CIM for Sig Dis Plan for Improvement. The document contains all of the Stepwell instructions and the additional information provided in this document will assist LEAs in preparing and submitting their CIM for Sig Dis Plan for Improvement to the California Department of Education (CDE) for review and approval.  LEAs are encouraged to utilize their Technical Assistance (TA) Facilitators and their Focused Monitoring and Technical Assistance (FMTA) Consultants to further refine the development of their plan and enhance the quality of the submission to CDE for approval.

## Getting Started

### Prepare:

- Review Annual Determination Letter (ADL) Notification.

- Attend ongoing mandatory webinars and meetings conducted by the CDE's Technical Assistance Provider, the State Performance Plan Technical Assistance Project (SPP-TAP).

### Submit Assurances Form:

All Sig Dis LEAs are required under IDEA to create and implement Comprehensive Coordinated Early Intervening Services (CCCEIS). In California, CCEIS falls under the CDE's Compliance and Improvement Monitoring process as CIM for Sig Dis. LEA requirements for the CIM for Sig Dis Plan for Improvement are outlined in the Assurances Form.

*The Assurances Form must be submitted to [sigdisp@cde.ca.gov](mailto:sigdisp@cde.ca.gov),*

*30 days after receipt of the Annual Determination Letter.*

## Select Technical Assistance (TA) Facilitator:

TA support will be available to assist Sig Dis LEAs in development and implementation of the CIM for Sig Dis Plan for Improvement. The CDE will fund a minimum of 10 hours per Sig Dis indicator of TA support for CIM for Sig Dis Plan for Improvement development through the SPP-TAP.

The LEA will complete a Memorandum of Understanding (MOU) with SPP-TAP and their selected TA Facilitator. This MOU will be submitted to SPP-TAP. The MOU is a required document and will describe the services and associated timeline of the support agreement between the TA Facilitator and the LEA. The support will be aligned with the CIM for Sig Dis Plan for Improvement requirements. All CDE-funded TA Facilitator support must be completed by June 30, 2024.

It is recommended that LEAs contract with the TA Facilitator for additional hours to provide ongoing support in the development and implementation of activities related to the CIM for Sig Dis Plan for Improvement.

***Selection of TA Facilitator AND signed MOU to SPP-TAP no later than May 1, 2024.***

## Plan Development

The table on the next page outlines the CIM for Sig Dis process. The table contains a rubric indicating the thoroughness of the completion of each activity within the steps. LEAs are urged to aim for the most comprehensive completion for successful implementation to address their significant disproportionality.  Comprehensive completion of each step will also efficient approval of the CIM for Sig Dis Plan for Improvement by the CDE.

| Step and Step Activities | Guidance | | |
|---|---|---|---|
| | **Insufficient** | **In Progress** | **Comprehensive** |
| **Step 1: Gather and Inquire** | | | |
| **1) CIM Team**<br><br>Identify and convene a CIM Team to lead the development and monitoring of the CIM for Sig Dis Plan for Improvement.<br><br>**Materials**<br><br>**Stepwell Instructions** | No CIM Team identified or convened. | One or more of the following are *not* evident:<br>• CIM Team is made of 3-5 cabinet level leaders.<br>• Team member names and titles are listed.<br>• Team members represent both general and special education.<br>• Team includes superintendent (or designee empowered to make decisions and report directly to and from superintendent).<br>• Role of Team members is clearly identified.<br>• CIM Team is meeting regularly. | *All* of the following are evident:<br>• CIM Team is made of 3-5 cabinet level leaders.<br>• Team member names and titles are listed.<br>• Team members represent both general and special education.<br>• Team includes superintendent (or designee empowered to make decisions and report directly to and from superintendent).<br>• Role of Team members is clearly identified.<br>• CIM Team is meeting regularly. |
| **2) Educational Partners Group**<br><br>Identify and convene an Educational Partners Group to advise and provide input throughout the CIM for Sig Dis process.<br><br>**Materials**<br><br>**Stepwell Instructions** | No Educational Partners Group identified or convened. | One or more of the following are *not* evident:<br>• Group member names and titles are listed.<br>• General and special education staff are included.<br>• SELPA director (or designee) is involved.<br>• An LEA fiscal representative is included.<br>• Three or more parents of the identified student group are active participants. | All of the following *are* evident:<br>• Group member names and titles are listed.<br>• General and special education staff are included.<br>• SELPA director (or designee) is involved.<br>• An LEA fiscal representative is included.<br>• Three or more parents of the identified student group are active participants. |

| Step and Step Activities | Guidance | | |
|---|---|---|---|
| | **Insufficient** | **In Progress** | **Comprehensive** |
| | | • Representatives from community organizations are included.<br>• Group members' roles in the process are clearly defined.<br>• Documentation is being maintained (e.g., meeting notes, agendas) that demonstrates meaningful opportunities for input by all Educational Partners. | • Representatives from community organizations are included.<br>• Group members' roles in the process are clearly defined.<br>• Documentation is being maintained (e.g., meeting notes, agendas) that demonstrates meaningful opportunities for input by all Educational Partners.<br>• Directors of curriculum and assessment are members of the Educational Partners Group.<br>• Once implementation has begun, individuals such as site level administrators and appropriate grade-level general and special education teachers, and other staff involved in implementation of CCEIS are included. |
| **3) Policy and Procedure Review**<br><br>**4) Findings and Revisions**<br><br>**5) Public Sharing of Revised Policies and/or Procedures**<br><br>**6) Internal Dissemination of Polices, Practices and Procedures** | Some or all of the following are *not* evident:<br>• Description of policy, practice, and/or procedure review is clear and documented. | The PPP review has been completed but the plan for addressing needed revisions doesn't align with areas of need as evidenced by the data. | All of the following *are* evident:<br>• Description of policy, practice, and/or procedure review is clear and documented.<br>• Compliance issues are noted and have been or will be addressed through the CIM for Sig Dis Plan for Improvement.<br>• Collection of data (qualitative and quantitative) to identify the factors contributing to significant disproportionality is documented. |

| Step and Step Activities | Guidance | | |
|---|---|---|---|
| | **Insufficient** | **In Progress** | **Comprehensive** |
| Materials: Resources for completing the Policies, Practices and Procedures Review can be found on the 2024 CIM for Sig Dis Materials webpage.<br><br>**Materials**<br><br>**Stepwell Instructions** | • Compliance issues are noted and have been or will be addressed through the CIM for Sig Dis Plan for Improvement.<br>• Collection of data (qualitative and quantitative) to identify the factors contributing to significant disproportionality is documented.<br>• A plan for publicly sharing revised policies and procedures is outlined.<br>• A plan for dissemination of new or | | • A plan for publicly sharing revised policies and procedures is outlined.<br>• A plan for dissemination of new or revised policies, practices, and procedures is outlined.<br>• Findings from initial PPP review clearly align with further data gathering and analysis to identify and address contributing factors of disproportionality (as evidenced in Step 2 and Step 3). |

| Step and Step Activities | Guidance | | |
|---|---|---|---|
| | **Insufficient** | **In Progress** | **Comprehensive** |
| | revised policies, practices, and procedures is outlined. | | |
| **7) Parent Input**<br><br>Conduct activities to gather parent input to inform the identification of contributing factors of disproportionality.<br><br>**Materials**<br><br>**Stepwell Instructions** | No parent input is gathered or no evidence that parent input is considered. | Parent input was gathered from parents of the identified student group(s). Challenges in obtaining transparent perspectives and experience resulted in limited feedback (e.g., minimal survey responses and/or focus group participation by the identified family groups). | Qualitative and quantitative data was obtained through multiple methods: empathy interviews, focus groups with parents, surveys, participation in the Educational Partners Group meetings, etc.<br><br>Parent input was analyzed. Patterns from parent input pointed to contributing factors of disproportionality, as evidenced in Steps 2 and 3.<br><br>Ongoing partnership with parents in monitoring of implementation and outcomes of CCEIS is evident in Step 4. |
| **8) Infrastructure Analysis**<br><br>**Materials**<br><br>**Stepwell Instructions** | No infrastructure analysis is completed. | The Infrastructure Analysis tool was completed. | The Infrastructure Analysis tool was completed.<br><br>Needs related to the LEA's area(s) of significant disproportionality are listed and plans for addressing those needs are provided. |

| Step and Step Activities | Guidance | | |
|---|---|---|---|
| | **Insufficient** | **In Progress** | **Comprehensive** |
| **9) Educational Benefit Review**<br><br>**Stepwell Instructions** | | | |
| **10) Data Drill Down**<br><br>Collect, identify, and review data from a variety of data sources as it relates to the elements/indicators that are identified as significantly disproportionate.<br><br>Complete and analyze results of one of the required CDE-approved self-assessment.<br><br>**Materials**<br><br>**Stepwell Instructions** | Use of a well-defined set of data not evident.<br><br>None of the self-assessment options are selected and/or completed. | One or more of the following are *not* evident:<br>• Collection and review of data from a variety of data sources as it relates to the elements/indicators that are identified as significantly disproportionate. Includes both general and special education data.<br>• Data is disaggregated by race/ethnicity.<br>• Completion of a Programmatic Self-Assessment, using one of the following tools:<br>  • Success Gaps Rubric: Addressing Equity, Inclusion, and Opportunity<br>  • Annotated Checklist for Addressing Racial Disproportionality<br>  • Equity in Education – Addressing Racial/Ethnic Disproportionality in Special Education, Volume 1 | *All* of the following are evident:<br>• Collection and review of data from a variety of data sources as it relates to the elements/indicators that are identified as significantly disproportionate. Includes both general and special education data.<br>• Data is disaggregated by race/ethnicity.<br>• Risk ratios are used to illustrate inequities. Data must be sorted by and analyzed with a focus on race, ethnicity, gender, and grade.<br>• Completion of a Programmatic Self-Assessment, using one of the following tools:<br>  • Success Gaps Rubric: Addressing Equity, Inclusion, and Opportunity<br>  • Annotated Checklist for Addressing Racial Disproportionality<br>  • Equity in Education – Addressing Racial/Ethnic Disproportionality in Special Education, Volume 1 |

| Step and Step Activities | Guidance | | |
|---|---|---|---|
| | **Insufficient** | **In Progress** | **Comprehensive** |
| | | • Both quantitative and qualitative data are included in the data drill down. | • Both quantitative and qualitative data are included in the data drill down.<br>• Trends from the data drill down findings are evident in Steps 2 and 3. |
| **11) Student Record Reviews**<br><br>**Stepwell Instructions** | | | |
| **12) Student Case Study**<br><br>Complete student case study and analyze findings to identify contributing factors to the disproportionality.<br><br>Note: This is not a compliance-related student file review.<br><br>**Materials**<br><br>**Stepwell Instructions** | No case study file review was conducted or was conducted with the wrong group of students. | A thorough, neutral case study file review of student files from the identified student group was conducted, examining the students' progression from pre-referral to eligibility. (Ten percent is considered to provide a reasonable representation of the student group.) | A thorough, neutral case study file review of at least 10 percent of the student files from the Sig Dis identified student group was conducted, examining the students' progression from pre-referral to eligibility.<br><br>A diverse group of staff members across roles in both general and special education participated in the student case study.<br><br>A robust reflective analysis of the findings demonstrates strengths, weaknesses, and trends in the system that show commonalities in the students' experiences and strong linkages to the areas of disproportionality. |

| Step and Step Activities | Guidance | | |
|---|---|---|---|
| | **Insufficient** | **In Progress** | **Comprehensive** |
| **13) Consolidation – areas of strength and data to support**<br><br>**Stepwell Instructions** | | | |
| **14) Consolidation – areas of weakness and data to support**<br><br>**Stepwell Instructions** | | | |
| **15) Consolidation – data-supported and quantified problem areas**<br><br>Briefly describe the LEA's demographics.<br><br>Provide a summary of the data collected and analyzed to support possible contributing factors of disproportionality and inform root causes.<br><br>**Materials**<br><br>**Stepwell Instructions** | There is no description of the LEA.<br><br>Consolidation of activities in Step 1 and problem areas have not been quantified. | Background information about the LEA is briefly described.<br><br>Summary of the data collected and analyzed demonstrates gaps in the data needed to move forward. | The LEA is described fully and concisely and the description includes demographics by race and ethnicity (beyond Local Control Accountability Plan (LCAP) categories). The history of significant disproportionality is included.<br><br>There is a clear, concise summary that includes key findings from the parent input, the programmatic self-assessment, the PPP, and other data that was reviewed. Any gaps or additional needed data are identified. |

2024 CIM for Sig Dis
Stepwell Instructions

Compliance and Improvement Monitoring for Significant Disproportionality
(CIM for Sig Dis)

Use this document to verify you are meeting the requirements of the online Stepwell submissions.

**PLEASE NOTE: The direct link to the 2024 CIM for Sig Dis materials is [https://spptap.org/2024-cceis-materials/](https://spptap.org/2024-cceis-materials/)**

# Step One: Gather and Inquire

| 1) CIM Team |
| --- |
| Record CIM for Sig Dis Team in Stepwell, with Name, Title/Role, and their responsibility as it relates to the CIM for Sig Dis development and implementation.<br><br>Refer to the CIM for Sig Dis Team and Educational Partner worksheet found on [https://caltan.info/monitoring](https://caltan.info/monitoring). |
| **2) Educational Partner Group** |
| Record CIM for Sig Dis Team in Stepwell, with Name, Title/Role, and their responsibility as it relates to the CIM for Sig Dis development and implementation.<br><br>Refer to the CIM for Sig Dis Team and Educational Partner worksheet found on [https://caltan.info/monitoring.](https://caltan.info/monitoring.) |

## 3) Policy and Procedure Review

List and provide an analysis of any Policies, Practices, and Procedures (PPP) that contribute to the factors of disproportionality.

Provide an analysis of any qualitative data to support the practices related to these policies and procedures.

Refer to the PPP template and reference document found on https://caltan.info/monitoring.

## 4) Findings or Revisions

Describe what policies and/or procedures will be revised, if any, as a result of reviewing the PPP.

## 5) Public sharing of revised policies and/or procedures

Address how the LEA reports publicly any added or revisions to the policies and procedures.

## 6) Internal dissemination of revised policies, practices, and procedures

Describe how the Policies and Procedures have been or will be internally disseminated and implemented.

## 7) Parent Input

Describe how Parent Input was gathered and considered in the CIM development process.

Provide an analysis of the Parent Input including patterns of strengths and weaknesses as they relate to the contributing factors of disproportionality.

| **8) Infrastructure Analysis** |
| --- |
| Identify the CIM Team members who participated in the Infrastructure Analysis and your team's process in completing the Analysis Tool. If staff outside of the CIM Team participated, identify them and their role in the district.<br><br>Outline the areas that the team considers to be strengths and areas of improvement related to the contributing factors of disproportionality. |
| **9) Educational Benefit Review** |
| Not applicable for CIM for Sig Dis. Write N/A in this box. |
| **10) Data Drill Down** |
| Collect, identify, and review data from a variety of data sources as it relates to the elements/indicators that are identified as significantly disproportionate. Include the types of data collected and reviewed, including historical and current data from quantitative and qualitative data sources.<br><br>Include an analysis of the Programmatic Self-Assessment findings in this area.<br><br>Refer to the Sample Data Sources tool and Self-Assessment tools and resources to use in the data analysis found on https://caltan.info/monitoring. |
| **11) Student Record Review** |
| Not applicable for CIM for Sig Dis. Write N/A in this box. |
| **12) Student Case Study** |
| Provide an analysis of the student case study findings in this section, including strengths, weaknesses, and trends in practices, from pre-referral to eligibility, which may be a contributing factor to the identified disproportionality. |

| **13) Consolidation - areas of strength and data to support** |
| --- |
| Not applicable for CIM for Sig Dis. Write N/A in this box.<br><br>See Activity #15 for CIM for Sig Dis. |
| **14) Consolidation - areas of weakness and data to support** |
| Not applicable for CIM for Sig Dis. Write N/A in this box.<br><br>See Activity #15 for CIM for Sig Dis. |
| **15) Consolidation - data-supported and quantified problem areas** |
| Briefly describe the LEA's demographics<br><br>Describe the disaggregated quantitative and qualitative data collected and analyzed to support possible contributing factors of disproportionality and inform root causes (disaggregated data, PPP findings, success gap statement,<br><br>Refer to the Guidance Document related to the requirements for the data analysis found on https://caltan.info/monitoring. |

## Step Two: Investigate

| **16) Prioritized Problem Areas** |
| --- |
| Not applicable for CIM for Sig Dis. Write N/A in this box.<br><br>See Activity #18 for CIM for Sig Dis. |

| **17) Problem areas to explore for Root Causes** |
|---|
| Provide an explanation or narrative of how root causes were determined. <br><br> Refer to the Guidance Document related for the requirements for root cause analysis found on https://caltan.info/monitoring. |
| **18) Indicator(s) of Significant Disproportionality** |
| List the significant disproportionality identification provided in the Annual Determination Letter and linked data sheet. <br><br> Refer to the data sheet link provided in the Annual Determination Letter for the specific identification of significant disproportionality. |
| **19) Root Cause #1 and supporting data** |
| State the root cause with the supporting quantitative and qualitative data. |
| **20) Root Cause #2 and supporting data** |
| State the root cause with the supporting quantitative and qualitative data. |
| **21) Root Cause #3 and supporting data** |
| State the root cause with the supporting quantitative and qualitative data, if necessary. <br><br> Write N/A if not necessary. |

| |
|---|
| **22) Root Cause #4 and supporting data** |
| State the root cause with the supporting quantitative and qualitative data, if necessary. |
| Write N/A if not necessary. |
| **23) Initiative Inventory** |
| List the LEA's initiatives, including any ongoing improvement plan that are related to the possible contributing factors of disproportionality. |
| State the commonalities among the initiatives and the disproportionality. |
| State the processes for collaboration and integration of the initiation of the LEA's inventory. |
| Describe any groups of students that are not served by the initiatives in the LEA's inventory. |
| Identify areas that are higher priority than others amongst the initiatives in the LEA's inventory. |
| **24) Target Population** |
| List the criteria for inclusion in the target group, including how the LEA will monitor implementation of CCEIS activities and track the students receiving CCEIS. |
| State the estimated percentages of students by race/ethnicity in the described target group. |
| Refer to the CIM for Sig Dis Guidance document found on https://caltan.info/monitoring. |

| **25) Theory of Action** |
|---|
| Create a theoretical statement that will guide the LEA's work moving forward and include which strategies the LEA will use to address the contributing factors that will result in reduced disproportionality and improved student outcomes.<br><br>Refer to the CIM for Sig Dis Guidance document found on [https://caltan.info/monitoring](https://caltan.info/monitoring). |

| **26) Additional Relevant Data** |
|---|
| If your Step 1 was accepted, but had conditions, this is the place to include the information that was required of Step 1. If you have no additional relevant data to share, type N/A into box.<br><br>Include any additional or revisional information to support Step 1 or Step 2. |

## Step Three: Plan for Results

| **27) Plan for Improvement Link** |
|---|
| Please provide the link to the Plan for Improvement in this box.<br><br>Use the template found on [https://caltan.info/monitoring](https://caltan.info/monitoring) to create and submit the Plan for Improvement.<br><br>Refer to the CIM for Sig Dis Guidance document, found on https://caltan.info/monitoring, to fill out the Plan for Improvement that will be submitted separately to [SigDisp@cde.ca.gov](mailto:SigDisp@cde.ca.gov) with a cc to your CDE FMTA Consultant. |

| 28) Submission |
|---|
| Include the date the LEA submitted the electronic Plan for Improvement to SigDisp@cde.ca.gov, then click the SUBMIT button.<br><br>Refer to the CIM for Sig Dis Guidance document, found on https://caltan.info/monitoring, to fill out the Plan for Improvement that will be submitted separately to SigDisp@cde.ca.gov, with a cc to your CDE FMTA Consultant. |