**Regulatory Guidance:** “[Local Educational Agency] LEA… Must address a policy, practice, or procedure it identifies as contributing to the significant disproportionality, including a policy, practice or procedure that results from a failure to identify, or the inappropriate identification of, a racial or ethnic group (or groups).” Title 34, *Code of Federal Regulations* (*CFR*) Section 300.646 (d)(1)(iii)

**Review Process:** This is a two-stage process.

1. Gathering documents to review and reading through the documents - can be done ***prior to root cause analysis***.
2. Analyzing the policies, practices and procedures (PPP) - should be done ***after the root cause analysis***.

Identify how the PPP materials are operationalized in relation to your LEA’s root causes of disproportionality. Board Policies listed in the matrix below should all be examined. Other Board Policies may pertain to your LEA’s indicators of significant disproportionality and should be reviewed. See list of other possible PPPs at the end of the document.

Step 1: Identify all related PPPs; note the dates they were last written or revised.

Step 2: Articulate how each are related to the root cause(s) of your LEA’s disproportionality.

Step 3: Suggested use of the questions below to evaluate how each of the PPPs reflects equitable access and opportunity in the LEA:

* To what extent does the PPP address disparities in treatment between and among student groups (i.e., disproportionality in participation and outcomes of particular student groups)?
* To what extent do practices and procedures reflect evidence-based practices to improve outcomes for ALL students?
* To what extent are responsibilities and clear lines of accountability included in the PPP?

Step 4: Determine if there is evidence of PPPs being consistently implemented as intended.

Step 5: Determine which PPPs may require revision for updates or need to be created.

Step 6: Determine if staff training is required for specific PPPs.

Step 7: Document specific revisions to be made.

Step 8: Describe how revisions will be shared (e.g., School Board meeting minutes, posting on LEA website, training) and identify any corresponding measurable outcome(s) from the Compliance and Improvement Monitoring (CIM) for Sig Dis Plan for Improvement related to revisions of PPPs articulated in the table below.

**Note**: PPP changes that require more time and effort can be included as activities in the CIM for Sig Dis Plan for Improvement.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **Policy, Practice or Procedure Document** *and**Accompanying Administrative Regulations (as appropriate)* | **Date Written / Last Revised** | **How Related to Our Root Cause** | **Reflects Equitable Access and Opportunity** | **Evidence of Dissemination and Fidelity of Implementation** | **Needs to be Written or Revised** | **What PPP or specific sections need to be updated /**  **written** | **Strategy to Update or Revise the Document**  **(include in your LEA’s CIM for Sig Dis Plan for Improvement)** |
| ***Board Policies Relating to Special Education*** | 2010 | The board policies identified related to the identification and eligibility for special education need to be updated. | All policies have been written and revised to conform to CSBA guidelines/ policies. There is no evidence that they reflect equity in relation to race and ethnicity. | Board policies are utilized to develop administrative regulations, special education handbooks, and other procedural manuals related to special education. | Yes |  | Updated board policies to be presented to the leadership team, cabinet and to the Board. |
| * BP 0410 Nondiscrimination |  |  |  |  |  | x |  |
| * BP 0415 Equity |  |  |  |  |  | x |  |
| * BP 0430 Local Plans |  |  |  |  |  | x |  |
| * BP 0460 LCAP |  |  |  |  |  | x |  |
| * BP 4111 Recruitment |  |  |  |  |  | x |  |
| * BP 4112/AR 4112.22 EL |  |  |  |  |  | x |  |
| * BP 4131 PD |  |  |  |  |  | x |  |
| * BP 6159 IEP |  |  |  |  |  | x |  |
| * BP/AR 6159.1 Procedural Complaints & Safeguards Special Education |  |  |  |  |  | x |  |
| * BP/AR 6159.2 Nonpublic Schools |  |  |  |  |  | x |  |
| **Policy, Practice or Procedure Document** *and**Accompanying Administrative Regulations (where appropriate)* | **Date Written / Last Revised** | **How Related to Our Root Cause** | **Reflects Equitable Access and Opportunity** | **Evidence of Dissemination and Fidelity of Implementation** | **Needs to be Written or Revised** | **What PPP or specific sections need to be updated /**  **written** | **Strategy to Update or Revise the Document**  **(include in your LEA’s CIM Plan)** |
| * BP/AR 6164.4 Identification and Evaluation for Special Education |  |  |  |  |  | x |  |
| * BP 6164.5 SST |  |  |  |  |  | x |  |
| - BP 6146.1 Graduation Requirement |  |  |  |  |  |  |  |

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| ***Board Policies Relating to Pupil Services and Discipline (including review of discipline behavior matrix)*** | **Date Written / Last Revised** | **How Related to Our Root Cause** | **Reflects Equitable Access and Opportunity** | **Evidence of Dissemination and Fidelity of Implementation** | **Needs to be Written or Revised** | **What PPP or specific sections need to be updated /**  **written** | **Strategy to Update or Revise the Document**  **(include in your LEA’s CIM Plan)** |
| * BP 5144.1 Suspension/ Expulsion   *(ED Code 48900)* | 2015  2018: behavior matrix added | District data points suggest that policies with regard to suspension and disciplinary practices are not being appropriately implemented across student groups by race and ethnicity. | The behavior matrix, if implemented consistently reflects equitable access and opportunity. | Administrators and support staff interviewed showed evidence that there is inconsistency around fidelity of implementation. | No |  | \*Training and consultation with principals around implementation of the policies, practices and procedures, including the behavior matrix. |
| Does the Suspension/Expulsion policy reflect the changes mandated in  SB 274? | BP 5144.1 was last updated in 2015 | Board Policy does not reflect the changes mandated in SB 274  District data points suggest that policies with regard to suspension and disciplinary practices are not being appropriately implemented | Without the change mandated in SB 274, this policy does not reflect equity and opportunity | Administrators and support staff interviewed showed evidence that there is inconsistency around fidelity of implementation | Yes | * BP 5144.1 Suspension/ Expulsion needs to be updated to reflect the mandated changes in SB 274 | Update board policies to be presented to the leadership team, cabinet and to the Board. |
| AR 5144.2 Suspension Expulsion Students with Disabilities | 3/14/07 | District data points suggest that policies with regard to suspension and disciplinary practices are not being appropriately implemented | Without current updates, this policy does not reflect equity and opportunity | Administrators and support staff interviewed showed evidence that there is inconsistency around fidelity of implementation | Yes | * AR 5144.2 needs to be updated | Update board policies to be presented to the leadership team, cabinet and to the School Board.  Training needed for site level leaders |
| ***Board Policies Relating to Section 504*** | **Date Written / Last Revised** | **How Related to Our Root Cause** | **Reflects Equitable Access and Opportunity** | **Evidence of Dissemination and Fidelity of Implementation** | **Needs to be Written or Revised** | **What PPP or specific sections need to be updated /**  **written** | **Strategy to Update or Revise the Document**  **(include in your LEA’s CIM Plan)** |
| -BP 6164.6 Section 504 | 2002 | Section 504 is underutilized as a pre-intervention strategy. | The current policy does not have a provision for supporting students with disabilities in general education. | Out of date policy has not been updated, disseminated and implemented. | Yes | BP 6164.6 Section 504 | Update board policies to be presented to the leadership team, cabinet and to the Board.  \*Training and for principals and site Section 504 teams. |
| ***Other Areas of Suggested Review*** | **Date Written / Last Revised** | **How Related to Our Root Cause** | **Reflects Equitable Access and Opportunity** | **Evidence of Dissemination and Fidelity of Implementation** | **Needs to be Written or Revised** | **What PPP or specific sections need to be updated /**  **written** | **Strategy to Update or Revise the Document**  **(include in your LEA’s CIM Plan)** |
| Section 504 Handbook | May 2006 | Section 504 is underutilized as a pre-intervention strategy. | The current Section 504 Handbook is inadequate (3 pages). | Out of date handbook has not been updated, disseminated, and implemented. | Yes | The entire handbook needs to be rewritten. | \*Section 504 handbook will be rewritten with an addendum describing roles and responsibilities of Section 504 site teams with training for principals and team members. |
| Review of Special Education Procedural Manual (handbook) | No hand-book | Lack of guidance has led to overidentification of White students for special education. | Lack of guidance does not support equitable access and opportunity for the identified students. | None | Yes | The manual must be written. | Specialized training for all staff role groups will be facilitated after the document has been written and approved. |
| Student Study Team (SST) Handbook or Guidelines | 2004 (not updated) | Lack of guidance and inconsistent implementation has led to overidentification of White students for special education. | Equity access and opportunity are spotty across school sites. | Spotty implementation results in inconsistent processes across the district. | Yes | The handbook must be completely updated and revised. | \* Training for all staff will take place after revision has been completed and approved by the administration. |
| ***Other Areas of Suggested Review*** | **Date Written / Last Revised** | **How Related to Our Root Cause** | **Reflects Equitable Access and Opportunity** | **Evidence of Dissemination and Fidelity of Implementation** | **Needs to be Written or Revised** | **What PPP or specific sections need to be updated /**  **written** | **Strategy to Update or Revise the Document**  **(include in your LEA’s CIM Plan)** |
| MTSS Practices and Strategies | None have been formalized to date. | Inconsistent utilization of evidence-based interventions has not resulted in improved student academic and behavioral outcomes. | Pre-intervention supports are not consistent across the district resulting in limited access for all students. | Currently school sites are reporting successful intervention practices and gathering data at the school site. District-wide there is no uniform system of supports. | Yes | All practices and strategies need to be articulated in written form. | Training for the entire educational community, including parents, will take place after revision has been completed and approved by the administration. |
| English Learners (EL) Master Plan | 9/5/12 | Outdated plan resulted in EL students not being appropriately served which caused significant over identifications of EL students requiring special education services. | Plan does not meet equitable access and opportunities due to the fact it has not been updated in 12 years and statutes have changed. | English Learner Master Plan is outdated and implementation is not current. | Yes | English Learner Master Plan needs to be updated to meet current regulations, | District needs to select a committee to rewrite the EL Master Plan. Upon completion of the plan it is to be presented to  the leadership  team, cabinet  and to the  School Board. |

**Additional PPPs for Consideration:**

* Attendance Policy
* Referral to Continuation Programs Policy (High School LRE)
* Community Day School Policy
* English Learner Policy, Procedures, Practices
* Student Care Team / Coordination of Services Team (COST) Practices and Procedures

**Additional Categorized Questions to Consider:**

***Equity and Culture***

* Are the district’s policies and procedures in the area of non-discrimination and equity well known to administrators, teachers, and staff?
* Are these policies and procedures widely and consistently implemented?
* Are cultural and linguistic considerations adequately addressed by the district’s policies, procedures and practices?
* Are curricular materials and teaching practices culturally inclusive?

***Pre-special education referral and pre-special education assessment Interventions***

* What specific effective pre-special education assessment interventions are being used?
* Are these interventions equally assessable for all students at all school sites?
* Are Multi-tiered System of Supports (MTSS) and Response to Intervention (RtI) Strategies consistently implemented per the district MTSS Plan?

***Discipline***

* Is discipline data accurately collected by school sites?
* Are district discipline policies, including the board adopted Discipline Matrix, consistently implemented across the district?
* Do school sites have the resources they need to implement the matrix and programs such as Positive Behavior Intervention Supports (PBIS) and restorative practices?
* Are any racial/ethnic groups of students disproportionately suspended or expelled?

***Student Study Teams***

* Is the Student Study Team (SST) Process outlined in district policies and procedures being implemented consistently at all school sites?
* Has every student referred for special education assessment had one or more SST meetings?
* Prior to special education referral for assessment, are SSTs providing effective interventions for students showing signs of academic, social, emotional or behavioral needs?

***504 Plans***

* Are the district’s policies and procedures regarding Section 504 Plans known and understood by administrators and teachers throughout the district?
* Are Section 504 Plans robust enough to meaningfully address student academic, social, emotional or behavioral needs?
* Are Section 504 Plans implemented as written?
* Are any racial/ethnic groups disproportionately provided or not provided 504 Plans?

***IEPs***

* Are special education staff and site administrators knowledgeable regarding district policies and procedures relating to developing and implementing IEPs?
* Are these policies and procedures related to developing and implementing IEPs widely and consistently practiced?
* Are the procedures outlined in the district special education policies and procedures manual consistently implemented by staff at school sites?