**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*** |  |  |  |  |  |  |  |
| * BP 0410 Nondiscrimination |  |  |  |  |  |  |  |
| * BP 0415 Equity |  |  |  |  |  |  |  |
| * BP 0430 Local Plans |  |  |  |  |  |  |  |
| * BP 0460 LCAP |  |  |  |  |  |  |  |
| * BP 4111 Recruitment |  |  |  |  |  |  |  |
| * BP 4112/AR 4112.22 EL |  |  |  |  |  |  |  |
| * BP 4131 PD |  |  |  |  |  |  |  |
| * BP 6159 IEP |  |  |  |  |  |  |  |
| * BP/AR 6159.1 Procedural Complaints & Safeguards Special Education |  |  |  |  |  |  |  |
| * BP/AR 6159.2 Nonpublic Schools |  |  |  |  |  |  |  |
| * BP/AR 6164.4 Identification and Evaluation for Special Education |  |  |  |  |  |  |  |
| * BP 6164.5 SST |  |  |  |  |  |  |  |
| - BP 6146.1 Graduation Requirement |  |  |  |  |  |  |  |

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| --- | --- | --- | --- | --- | --- | --- | --- |
| **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)** |
| ***Board Policies Relating to Pupil Services and Discipline (including review of discipline behavior matrix)*** |  |  |  |  |  |  |  |
| * BP 5144.1 Suspension/ Expulsion   *(ED Code 48900)* |  |  |  |  |  |  |  |
| Does the Suspension/Expulsion policy reflect the changes mandated in  SB 274? |  |  |  |  |  |  |  |
| AR 5144.2 Suspension Expulsion Students with Disabilities |  |  |  |  |  |  |  |
| ***Board Policies Relating to Section 504*** |  |  |  |  |  |  |  |
| -BP 6164.6 Section 504 |  |  |  |  |  |  |  |
| ***Other Areas of Suggested Review*** |  |  |  |  |  |  |  |
| Section 504 Handbook |  |  |  |  |  |  |  |
| Review of Special Education Procedural Manual (handbook) |  |  |  |  |  |  |  |
| Student Study Team (SST) Handbook or Guidelines |  |  |  |  |  |  |  |
| MTSS Practices and Strategies |  |  |  |  |  |  |  |
| English Learners (EL) Master Plan |  |  |  |  |  |  |  |

**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?