Guidance Document for Compliance and Improvement Monitoring (CIM) for Significant Disproportionality (Sig Dis) – Step 2

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 the Stepwell instructions for Step 2. 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.

Plan Development

This table outlines Step 2 of the CIM for Sig Dis process. The table contains a rubric indicating the thoroughness of the completion of each activity in Step 2. Submissions may be returned to LEAs for revision if they do not meet the criteria listed in the comprehensive column.

Step and Step Activities	Rubric		
	No Evidence	**In Progress**	**Comprehensive**
Step 2: Investigate			
16) Prioritized Problem Areas **Stepwell Instructions:** Write N/A in this box.			
17) Problem Areas to Explore for Root Causes **Stepwell Instructions:** Provide an explanation or narrative of how root causes were determined.	No explanation provided.	One or more of the following are *not* evident: • Explanation or narrative of process for determining root causes is provided and	*All* of the following are evident: • Explanation or narrative of process for determining root causes is provided and engagement of CIM

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[**Materials**](#)		engagement of CIM Team and Educational Partners in discussions about probable root causes. • Alignment with data is evident.	Team and Educational Partners in discussions about probable root causes. • Alignment with data is evident.
18) Indicator(s) of Significant Disproportionality **Stepwell Instructions:** List the significant disproportionality identification provided in the Annual Determination Letter and linked data sheet.	No indicators are listed.	Incorrect or partial information about indicators is listed (e.g., may be missing specific disability category or race/ethnicity).	All indicators are listed accurately.
19) Root Cause #1 and Supporting Data **20) Root Cause #2 and Supporting Data** **21) Root Cause #3 and Supporting Data** **22) Root Cause #4 and Supporting Data** **Stepwell Instructions:** State the root cause with the supporting quantitative and qualitative data. Write N/A for 21 and 22, if necessary. **Guidance:** Ensure that • root cause analysis is undertaken with a cultural lens in addressing the demographics that are over-identified.	No root causes(s) identified. Root causes(s) not supported by data.	One or more of the following are *not* evident: • Root cause(s) are identified specific to the area(s) of disproportionality that could address the factors contributing to disparate outcomes for students. • Root causes are within the LEA's control to effect change that will improve student outcomes.	*All* of the following are evident: • Root cause(s) are identified specific to the area(s) of disproportionality that could address the factors contributing to disparate outcomes for students. • Root causes are within the LEA's control to effect change that will improve student outcomes.

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- focus is on early-intervention, pre-referral, and general education efforts. - intersection of beliefs or mindsets present in the LEA and their practices should be evident in the prioritized root causes. - the data is reviewed through the diverse perspectives of the Educational Partners Group. - district policies, practices, processes, and routines are examined as contributing factors to disproportionality. - root causes identify issues within the LEA system of support, rather than challenges attributed to students or families.		Quantitative AND qualitative data are used support the identified contributing factors.	Quantitative AND qualitative data are used support the identified contributing factors.
23) Initiative Inventory **Stepwell Instructions:** - 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.	LEA Initiative Inventory not used or alignment/ integration not evident.	Partial list of initiatives is provided on the LEA Initiative Inventory. Alignment and/or integration with these initiatives is not evident and/or did not address disproportionality. One or more of the following are missing: Commonalities among the initiatives and the disproportionality.	Comprehensive list of LEA-wide and school-wide initiatives is provided, aligned, and integrated with these initiatives to address disproportionality. *Examples: Local Control Funding Formula (LCFF); Local Control and Accountability Plan (LCAP); LEA improvement initiatives (e.g., Title I, Title III); LEA Plan under Every Student Succeeds Act (ESSA) PBIS; MTSS; Performance Indicator Review (PIR), Comprehensive Review (CR).* All of the following are described:

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• 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. **Guidance:** • This LEA Initiative Inventory Activity is designed to support a review of past and current initiatives, including any ongoing improvement plan. The purpose is to identify strategies that have been successful and any gaps or implementation challenges, while considering existing mandates and resource commitments. • This work is undertaken with a cultural lens in addressing the demographics that are over-identified. • Put the focus on early-intervention, pre-referral, and general education efforts especially for the race or ethnicity group identified as significantly disproportionate. • Ensure the CIM Team works with the Educational Partner Team in this activity. **Materials**		• Processes for collaboration and integration of the initiation of the LEA's inventory. • Description of any groups of students that are not served by the initiatives in the LEA's inventory. • Identification of areas that are higher priority than others amongst the initiatives in the LEA's inventory.	• Commonalities among the initiatives and the disproportionality. • Processes for collaboration and integration of the initiation of the LEA's inventory. • Description of any groups of students that are not served by the initiatives in the LEA's inventory. • Identification of areas that are higher priority than others amongst the initiatives in the LEA's inventory.

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24) Target Population **Stepwell Instructions:** • 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. **Guidance:** As CCEIS is intended to prevent over or inappropriate identification, a majority, if not all, students will be students without IEPs. The exception to this may be LEAs identified as significantly disproportionate for placement and/or discipline. Each LEA determines the criteria for the selection of the students that will receive CCEIS based on the root cause analysis process and the factors they found that contribute to their disproportionality. This Target Population is defined as "children from age 3 through grade 12, particularly, but not exclusively, children in those groups that were significantly over-identified, including children not currently identified as needing special education or related services but who	• The LEA has not described the criteria to determine the students who are in need of additional supports to be successful in general education environment OR • the estimated percentages of students by race/ethnicity are not provided OR • the student group is exclusively students with disabilities OR • the students to be served are only of one racial/ethnic group OR exclude one or more racial or ethnic group.	One or more of the following are missing: • Criteria for inclusion in the target group is specific, clear, and aligns with the data analysis and the root causes previously identified. • Target population meets the federal guidelines listed in the first column. • Estimated number of students to be served is provided and is not exclusively students with disabilities. • Percentages of students, by race/ethnicity, are provided that appropriately represent the identified student group (students to be served must be particularly, but not exclusively, of the identified group).	All of the following are described: • Criteria for inclusion in the target group is specific, clear, and aligns with the data analysis and the root causes previously identified. • Target population meets the federal guidelines listed in the first column. • Estimated number of students to be served is provided and is not exclusively students with disabilities. • Percentages of students, by race/ethnicity, are provided that appropriately represent the identified student group (students to be served must be particularly, but not exclusively, of the identified group).

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need additional academic and behavioral support to succeed in a general education environment and children with disabilities. (See 34 *C.F.R.* Section 300.646(d)(2).) An LEA may not limit comprehensive CEIS only to children with disabilities (See 34 *C.F.R.*§300.646(d)(3), nor can the target population equal the number of all students. **Materials**			
25) Theory of Action **Stepwell Instruction:** 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. **Guidance:** The Theory of action is a statement that distills all of the CIM for Sig Dis work from Steps 1 and 2, and informs the activities to be planned and implemented in Step 3 and Step 4. **Materials**	No theory of action is present.	A theory of action is present but is lacking connectivity to the contributing factors of the LEA's disproportionality.	The theory of action identifies which strategies the LEA will use to address the contributing factors that will result in reduced disproportionality and improved student outcomes. The statement is clearly connected to the previous data analyses, root causes, and target population.
26) Additional Relevant Data **Stepwell Instructions:** • Include any additional or revisional	Item left blank, if information is needed.	When this item is required, additional information provided does not address the	N/A entered or additional information provided adequately addresses the

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information to support Step 1 or Step 2. • 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.		conditions for revision from Step 1.	conditions for revision from Step 1.

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