



Overview

***Please note: This is a sample that is specific to a particular Local Education Agency (LEA).
Only one High Leverage Strategy is provided. Each LEA's information will look different.***

During Step 2: Investigate, the CIM Team developed and prioritized root causes. In Step 3: Planning, the CIM Team will use these root cause(s) to develop the CIM Plan. Completion of CIM plan development will include the following:

Section 1: CIM Team Members, Overall Goal/Problem of Practice, and Prioritized Root Causes
Section 2: High Leverage Strategies and Supporting Activities; Expected Measurable Outcomes; Standards of Success; and Methods of Measurement

The CIM Team will enter required information into the forms at the end of this document and submit this completed document for review (to either the Special Education Local Plan Area (SELPA) or the California Department of Education (CDE), as applicable to the LEA's monitoring tier and level).

Section 1: CIM Team Members, Overall Goal/Problem of Practice, and Prioritized Root Causes

The LEA will identify members of the CIM Team, list the overall goal/problem of practice of the CIM plan and the prioritized root cause(s). CIM Plan implementation will be completed by June, 2026. For Significantly Disproportionate (SIGDIS) Local Educational Agencies (LEAs), the CIM must be completed by September, 2025.

Section 2: High Leverage Strategies and Supporting Activities; Expected Measurable Outcomes; Standards of Success; and Methods of Measurement

For each high leverage strategy, identify the expected measurable outcome(s), and applicable root cause(s). For SIGDIS LEAs, the target population must be included. List the activities that will be implemented in support of the high leverage strategy with the staff responsible for implementation and monitoring; the timeline; the appropriate data sources and methods for evaluating progress; and the appropriate required resources. For SIGDIS LEAs, the funding source must be included.





Section 1: CIM Team Members, Significant Disproportionality Indicators, and Prioritized Root Causes

CIM Team Members:

List your CIM Team members. Indicate Yes (Y) or No (N) regarding whether the listed member will be responsible for overseeing implementation of the CIM Plan. List the primary contact person first.

Name (list the primary contact person first)	Role	Email	Responsible for overseeing implementation? (Y or N)
Gary White	Equity Director, Overhill Unified School District (OUSD)	gwhite@ousd.edu	Y
Shelley Jepson	Director Student Support Services	sjepson@ousd.edu	Υ
Mr. Frank Abdulo	Asst. Superintended of Business/Fiscal Service	fabdulo@ousd.edu	Y
Dr. Sharon Grassey	Director of Special Education	sgrassey@ousd.edu	Y
Mr. John Esposito	Superintendent	jesposito@ousd.edu	N

Overall Goal or Problem of Practice:

List the identified guiding factor for the CIM plan (Overall Goal or Problem of Practice).

	Overall Goal or Problem of Practice
African American - Emotional Disturbance (ED)	
African American – Other Health Impairment (OHI)	





Prioritized Root Causes:

List no more than three root causes, prioritized in order of importance, along with data summary statements that support the root cause:

Root Cause	Data Summary Statements
Root Cause #1: Lack of	Empathy Interviews/Focus Groups
defined and consistent	There is broad agreement that implementation of school-wide behavior plans varies by staff.
Multi-tiered System of	• 50% of staff indicate colleagues do not share a common philosophy for behavior and disciplinethis impacts the MTSS processes at
Supports (MTSS), and	the school sites.
Student Support Team	
(SST) processes, and	Special Education File Review
procedures across all	• 58.1% of Special Education referrals are from parents. This indicates that the MTSS process is not being communicated to or
schools.	implemented appropriately for students and families as viable options for support.
	NYU Disproportionality Study
	• 58.7% of Special Education referrals are from parents. Confirming the need for better engagement and communication with families
	to ensure culturally responsive implementation of MTSS School-Wide Positive Behavior Supports.
	The district's over all classification rate for Special Education is 17.9% which is higher than the California state average classification
	rate of approximately 13% (2022). This indicates that the MTSS process is not being utilized effectively to support students at Tiers I
	and II. Areas of concern are not being addressed prior to referral and assessment for Special Education.
	and it. Aleas of concern are not sering addressed prior to forenal and assessment for special Education.
	Policies, Practices, and Procedures Review
	Board Policy 6164.5 regarding SST is missing from the Board Policy Manual. There is a need, as indicated in Step 1 submission, to
	codify in policy the SST process including pre-referral and post-referral practices.
	The current Special Education Manual is outdated. It does not address pre-referral practices, further contributing to lack of clarity, and
	consistency in the SST process.





Root Cause #2: Beliefs and mindsets tend to be deficit-oriented. There is a lack of examination of belief structures related to race and culture, particularly around the African American community, and traumainformed practices.

Empathy Interviews/Focus Groups

• Participants felt that teaching behavioral expectations is a priority and is within their job responsibilities. However, there is a belief that children with challenging behavior need more specialized services/programs than what is available in the general education classroom.

NYU Disproportionality Study

- African American students are 4.73 times more likely to be determined eligible for special education services for emotional disturbance, and African American students are 3.22 times more likely to be identified as Other Health Impaired as compared to their peers.
- African American students are 3 times more likely to be disciplined as compared to their peers.
- Thirty-nine percent of discipline referrals of African American students cite subjective reasons (e.g. defiance and disrespect) for the referral.
- This data indicates that the classroom and school climate are not inclusive, and there is a need to implement reflective practice that examine belief structures around implicit bias and cultural competency.

Policies, Practices, and Procedures Review Matrix

- Board Policy 4131, which addresses Professional Development, does not reference directly or indirectly equity. This suggests that the school district is not currently looking at all professional development training and implementation through a cultural lens, particularly relating to the African American students.
- In OUSD's board policy 4131, addressing professional development there is no mention of equity suggesting that the school district is not currently looking at all professional development training and implementation through a cultural lens. The Educational Partners have identified a need to weave equity and cultural competency into all professional development in order to address the disproportionality amongst African American student populations.





Section 2: High Leverage Strategies and Supporting Activities; Expected Measurable Outcomes; Standards of Success; and Methods of Measurement

For each high leverage strategy selected by the CIM Team, describe the Expected Measurable Outcome(s) as a result of implementing each high leverage strategy. Include a description of the quantifiable standard of success and applicable root cause(s). SIGDIS LEAs must also list the identified target population.

For each activity, describe the standard of success and how it will be measured. Identify the staff responsible for implementation and monitoring of the activity, as well as the associated timeline and the required resources. SIGDIS LEAs must also list the related funding source.

Collectively, high leverage strategies should address prioritized root causes. Please be specific.

High Leverage Strategy #1

High Leverage Strategy: Implementing an expanded and culturally responsive Multi-Tiered System of Support (MTSS)

Expected Measurable Outcome(s): By June 2026, the district will expand and implement MTSS with fidelity in order to reduce ED's risk ratio from 4.73 to less than 3.00, and OHI's risk ratio from 3.22 to less than 3.00.

By May 30, 2026, staff will utilize appropriate pre-referral, referral, and post-referral processes in order to decrease the risk ratio for African American student identification as ED from 4.73 to less than 3.00, and identification as OHI from 3.22 to less than 3.00.

By June 2026, schools and teachers will design and implement culturally relevant, responsive, and trauma-informed education in order to reduce ED's risk ratio from 4.74 to less than 3.00, and OHI's risk ratio from 3.22 to less than 3.00.

By September 2026, OUSD will implement a culturally responsive framework to increase culturally responsive practices in the classrooms with target students, as measured by Equity Walks and a 5% decrease in the discipline referrals for African American students.

Applicable Root Cause(s): Root Cause 1: Lack of consistency and fidelity with MTSS (SST) processes and procedures across all schools. Root Cause 2: Beliefs and Mindset tend to be deficit oriented/not intervention or strength based, and need to examine beliefstructures around cultural competency, specifically around the African American community, and trauma-informed practices.





Target Population: General education students in the four schools with the highest suspension rates:

- · with three or more discipline referrals in the past year and
- who are in Transitional Kindergarten (TK) through 2nd grade.

Parent information will be used to determine if a TK student meets the discipline criteria as the district does not have access to pre-school data and often discipline referrals at this young age are not documented.

Based on these criteria, we estimate our target population will be 280 students with 57% being African American students. Current enrollment in the district is 18,229. Our Target Population will be approximately 2% of the total student population.

Note: For SIGDIS only

Activity*	Staff Responsible for Implementation and Monitoring	Timeline	Data Sources/Methods for Evaluating Progress (as appropriate)	Resources Required (as appropriate)	Funding Source (SIGDIS Only)
Activity 1.1 - The district will hire an MTSS coach for the duration of the 2024 CIM for Sig Dis plan.	Shelley Jepson	Approval for job creation and create job description by January 15, 2025. Post job, review applications, interview applicants, and hire a coach by March 30, 2025.	Job description, job posting, hiring process documentation, and contract.	Support from HR for recruitment and hiring.	Note: Blended funding will be used since CCEIS funds cannot be used for all students (Tier 1 supports). LCAP CCEIS





Activity 1.2 - With the support of	Shelley Jepson	Approval of the MTSS	Menu of Tier 1, Tier 2, and	Learning Support	Blended funding:
the district Learning Support		framework and	Tier 3	Teacher time	LCAP
Teacher (LST) the district MTSS	MTSS Coach	fidelity measure by	interventions		CCEIS
committee will submit the		June 1, 2025.		MTSS committee time	
expanded MTSS (Tier I, Tier II, SST)	LST		Fidelity measure		
Instructional framework and fidelity				Time on Board agenda	
of implementation measures for			MTSS guidebook		
academic and social					
emotional/behavior support for			Final Board approval		
board approval.					
Activity 1.3 - Train administrative	Shelley Jepson	Train administrators,	Training schedules	Training Materials	Blended funding:
and lead certificated staff (coaches)		and			LCAP
on the MTSS framework to include	MTSS Coach	identify and train	Training agendas	Training Facility	CCEIS
multi-tier resources with a focus on		coaches by August			
interventions for both Tier 1		15, 2025.	Training materials	Administrative staff and	
(universal) and Tier 2 (secondary)				coach time	
supports including universal			MTSS implementation		
screeners, ongoing data collection,			fidelity tool		
parent partnerships and school wide					
approaches to expectations, and					
supports for academics and social-					
emotional/behavior.					





Activity 1.4 - The district will	Shelley Jepson	Create PD by August	Training schedule	Training Materials	Blended funding:
create and provide professional		15, 2025.			LCAP
development (PD) on consistent	MTSS Coach		Training materials and	Training Facility	CCEIS
MTSS recommended practices, pre-		Provide PD by	agendas		
referral procedures, and processes		October 1, 2025.		Certificated staff time	
related to SST, including how to			MTSS and SST protocols		
utilize Tier I, II, and III evidence-					
based interventions for the purpose			MTSS and SST flow chart		
of ensuring equitable opportunities					
and access to general education			MTSS and SST referral data		
services for all students based upon					
collected data, and individual need.					
Activity 1.5 - Training for Social-	Shelley Jepson	Provide PD by	Menu of Tier I and II	SELS time	Blended funding:
Emotional Learning Specialists		October 1, 2025.	interventions		LCAP
(SELS) to align their efforts with the	MTSS Coach				CCEIS
MTSS guidebook to support all		SELS support to	MTSS fidelity measures		
students with Tier I and Tier II level		target school sites			
social-emotional/behavioral support		October 10, 2025-	MTSS guidebook		
and interventions to include		June 5, 2026.			
interventions for both Tier 1			Special Education Manual		
(universal) and Tier 2 (secondary)			and Guidance Document		
supports, universal screeners,					
ongoing data collection, parent					
partnerships, and school wide					
approaches to expectations and					
supports for social-					
emotional/behavior.					





Activity 1.6 - Through the	Shelley Jepson	Purchase of data	SST referral data and	Data collection and	Blended funding:
purchase of MTSS data collection		collection and	documentation	analysis tools	LCAP
and analysis tools, the district will	MTSS Coach	analysis tools by	corresponding to Tier 1		CCEIS
collect and analyze MTSS and SST		June 30,	interventions,	Staff time for data	
data as it relates to race/ethnicity in		2025.	Tier2 interventions, Tier 3	collection, analysis and	
the areas of utilization of MTSS			interventions, and Fidelity	refinement of practice	
Instructional framework, fidelity of		Collect and Analyze	measure.	based on data	
implementation measures, and		Data monthly:			
implementation of the pre-referral		October 10, 2025			
processes and procedures outlined		Through August 15,			
in the provided professional		2026.			
development.					
Activity 1.7 - With the support of	Dr. Sharon Grassey	Board Policy	PPP Review Matrix	Staff time	Note: CCEIS funds will
the Special Education Department,		approval by March			not be used.
the program specialists will		15, 2025.	Special Education Manual		
complete the Special Education					Special Education
Manual/Guidance Document.		Guidance Document			Funds
		development March			
		15, 2025-June 15,			
		2025.			





Activity 1.8 - To address the	Dr. Sharon Grassey	Psychologists will be	Rubric for comprehensive	Staff time	Note: CCEIS funds will
identified root cause, school		trained by	ED and OHI assessments		not be used.
psychologists will continue to meet		September 15,			
to address referrals for ED and OHI		2025.	ED/OHI professional		Special Education
assessments. With the support of			development cohort		Funds
the special education department,		Psychologist PD	attendance		
our school psychologists will create		cohorts will meet			
and implement the use of an OHI		September 15,	Assessment fidelity		
and ED rubric, including fidelity		2025-May 30, 2026.	measure for		
measures, to address high quality			comprehensive ED and		
assessment practices.			OHI.		
Activity 1.9 - With collaboration	Gary White	Professional	Training materials and	External Consultant, staff	CCEIS funds
with the Director of Equity, the		Development	agendas	time	
district will provide new and		conducted Spring			
continuing Professional		2025 - September	Pre and post individual		
Development to district and site		2026.	growth surveys of		
leaders around deeper			participants		
understanding of					
bias-based beliefs (e.g.			Site administrative		
Trauma-Informed Teaching, Race &			walkthroughs for evidence		
Culture, Implicit Bias, Culturally			of implementation		
Responsive Pedagogy, etc.), and					
how they operate within pedagogy			CA Dashboard data		
and practices both implicitly, and			disaggregated by race and		
explicitly.			ethnicity		



2024 Compliance and Improvement Monitoring for Significant Disproportionality (CIM for Sig Dis) Step 3: Plan for Improvement California Department of Education – Special Education Division



Activity 1.10 - The district will	Gary White	Create trainer of	Trainer selection	External Consultant, staff	CCEIS Funds
create a trainer of trainers		trainers model and		time	
implementation model, and		identify coaches and	Training materials and		
identify trainers to provide		create	agendas		
self-sustaining professional		self-sustaining PD			
development that targets beliefs		with incorporated	Fidelity measures		
and mindsets with incorporated		fidelity measures:			
measures that address fidelity of		Fall 2025.	Training implementation		
implementation to continuously			model		
improve how schools and teachers		Professional			
design and implement, culturally		Learning Network –	Site administrative		
relevant, and responsive education.		Fall 2025 –	walkthroughs for evidence		
		September 2026	of implementation		
			CA Dashboard data		
			disaggregated by race and		
			ethnicity		
Activity 1.11 - Conduct equity	Gary White	Fall 2025 - Spring	Equity Walk Rubrics	Equity Walk Rubrics	CCEIS
walks to collect qualitative data to		2026			
inform equity driven work, and				Staff time	
deepen equity lens at the student					
level.					
Activity 1.12 - Use site equity	Gary White	Fall 2025-Spring	Comparative data analysis	Data analyst time	CCEIS
walk data (above) to assess and	Cary Willie	2026	Comparative data analysis	Data anaiyst tille	CCLIS
identify the needs of students, as		2020		Spreadsheet for	
well as inform actions steps to				recording needs and	
address the identified needs.				action steps	
address the identified fleeds.				action steps	



2024 Compliance and Improvement Monitoring for Significant Disproportionality (CIM for Sig Dis) Step 3: Plan for Improvement California Department of Education – Special Education Division



Activity 1.13 - Customize	Gary White	Fall 2025 -	Retrospective Self-	Meeting materials	CCEIS
coaching support for site Principals		September 2026	Reflection by above staff		
and Site Equity/Leadership Teams			regarding their awareness	Small group meeting	
based on equity walk data. This will			and actions to effect	spaces	
focus on capacity building at the			change.		
site level through various aspects of					
action planning in strategically					
identifying, implementing, and					
monitoring actions that impact the					
discipline referrals for identified					
target student groups					

^{*}Add more rows for Activities, as needed. **If the activity is expected to be "on-going," the End Date would be the point in which the activity is fully implemented and could be initially assessed.