

Paramount Unified School District
Comprehensive Coordinated Early
Intervening Services Plan

BOARD PRESENTATION

October 4, 2021

CDE Special Education
Monitoring System has 3
levels of compliance
monitoring for all
Districts/LEAs in the state:

1. Universal
2. Targeted
3. Intensive



**SIGNIFICANT
DISPROPORTIONALITY**
**Chronic systemic long- term
issues**

INTENSIVE
SIG DIS STATUS =
CCEIS PLAN General
Education Plan

CDE SPECIAL EDUCATION DIVISION

Monitoring Levels

TARGETED
SEP Required in specific
areas based on identified
elements

UNIVERSAL
all LEAs

The 2021-2022 CDE monitoring status for Paramount Unified School District for is at the **INTENSIVE MONITORING level.**

Paramount Unified School District **has been identified** as significant disproportionality due to an over representation of students who are **African American with Emotional Disturbance.**

Identified with Significant Disproportionality (Yes/No)	YES
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“The Individuals with Disabilities Education Act (IDEA 2004) requires states and local education agencies (LEAs) to take steps to address disproportionate representation.

Disproportionality refers to the ‘overrepresentation’ of a particular racial or **ethnic group in one of four areas**:

- 1.Special education in general
- 2.Special education within a specific disability category
- 3.Disciplinary action assigned to students with disabilities
- 4.Placement of students with disabilities in more restrictive environments (LRE-Least Restrictive Environment)

A district is found to be SIGNIFICANTLY DISPROPORTIONATE If a district is disproportionate for **3 consecutive years** for any group in any of the 4 areas.



Significantly Disproportionate Status Consequences:

When found to be Significantly Disproportionate, the CDE requires that the district must:

1. **WRITE** a **Comprehensive Coordinated Early Intervening Services (CCEIS) Plan.**
2. **COMMIT 15% of their Federal IDEA** funding from Parts B and C to fund activities included in the CCEIS Plan.



CCEIS Plan FACTS

1. Comprehensive Coordinated Early Intervening Services (CCEIS) Plan Development is required by the IDEA.
2. This is not a new process. The US office of Since the U.S. Office of Civil Rights first began to collect data on Special Education programs in **1968**.
3. States are required to monitor districts specifically related to the **disproportionate representation** of racial and ethnic groups in special education and related services.
4. Districts must write a Comprehensive Coordinated Early Intervening Services Plan (CCEIS) to address the causes of disproportionality.

The CCEIS Plan is a General Education Plan

CCEIS is the Comprehensive Coordinated Early Intervening Services plan to provide:

- targeted and meaningful interventions focused on
- illuminating and addressing the root causes underlying systemic processes which undermine equitable access to educational experiences.

The CCEIS Plan is a general education plan meant to interrupt overrepresentation and disproportionality in special education.

CCEIS Plan Activities must

- Address the factors contributing to the significant disproportionality.
- Focus on academic and behavioral instructional services and professional development.
- Consider **age three through twelfth grade instructional activities** with a primary focus on students age three through third grade.
- Allow expenditures on preschool if an LEA has an established preschool program as part of the Preschool–12 educational system.
- Occur within the allowable **CCEIS budget period of 27 months.**
- IDEA also requires that LEAs provide for the review and, if applicable, revision of the policies, procedures, and practices 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); and publicly report any revision of policies, practices, and procedures.

What does that mean for your district?

Student impact

Fiscal impact

Addressing Significant Disproportionality is a priority for all students!

The CCEIS plan is a general education plan that reflects services to **general education students** prior to referral to special education to address root causes and implement interventions to prevent future identification. The measurable outcomes of the plan are tied to the progress monitoring of specific **students** in the Target Group.



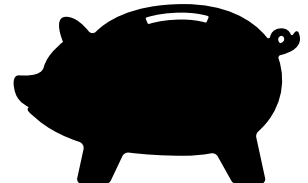
Fiscal Requirements




Reserve 15 percent of Fiscal Year 21-22 IDEA Grant Funds

15 %

- ⦿ Supplement not supplant
- ⦿ Personnel who exclusively serve students with disabilities cannot be funded using CCEIS.
- ⦿ IDEA funds budgeted for the 2021 CCEIS plan must be exhausted within the 27-month report period.
- ⦿ Estimated CCEIS funds are \$452,000





**What sets the
CCEIS Plan
apart from
other plans?**

IMPROVEMENT SCIENCE

4 PHASE PROCESS

COMPLEXITY

CONCENTRATED PROCESS

QUANTITATIVE DATA

QUALITATIVE DATA

STAKEHOLDER INPUT

FOCUS ON SPECIFIC STUDENTS

EXTERNAL ACCOUNTABILITY

MONITORING STUDENT OUTCOMES

QUARTERLY REPORTING

IMPLEMENTATION EVIDENCE

Programmatic Improvement Process

Apply a Cultural Lens throughout the four phase process



CCEIS Plan Development

Phase 1: Getting Started

Timeline: February to June 2021

Activities:

- Identify and convene **Leadership Team and Stakeholder Group**
- Contact the State Performance Plan- Technical Assistance Project (SPP-TEP) at Napa County Office of Education Focused Monitoring and Technical Assistance (FMTA) Participate in 2021 Comprehensive Coordinated Early Intervening Services Workshop A
- Gather relevant data, disaggregated by race, ethnicity, and gender
- Complete file reviews of students identified by the California Department of Education (CDE)

Phase 2: Data and Root Cause Analysis

Timeline: February to June/July, 2021

Activities:

- Complete Local Educational Initiative Review
- Complete Policy, Procedure and Practices Review
- Complete Programmatic Self Review
 - Conduct Focus Groups with district leadership, related service providers, teachers, and parents
- Determine the Root Cause
- Participate in 2021 Comprehensive Coordinated Early Intervening Services Workshop B

Phase 3: Planning for Improvement

Timeline: June to August, 2021

Activities:

- Develop Program Improvement Plan
- Identify Targeted Student Group
- Complete Budget Forms
- Submit Plans to Special Education Local Plan Area for Final Review
- Present Plan to Board of Trustees for Approval
- **Submit Plan to California Department of Education by SEPTEMBER 30, 2021**

Phase 4: Implementing, Evaluating and Sustaining

Timeline: January 2022-December 2024

Activities

- Monitor the Targeted Student Group to Evaluate Program Outcomes
- Evaluate Effectiveness by Collecting and Analyzing Data

Quantitative Data Analysis

Discipline/Academic

- California Data Dashboard and DataQuest
- My Data
- District Reported 18-19 Data to State in 2019

ED Eligibility Data

- Longitudinal ED Eligibility History Data Placement Analysis
- File Review Data

504 Support Analysis

- 504 Report



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DISTRICT
ENROLLMENT
AND % OF
STUDENT
ENROLLMENT
BY
ETHNICITY

Ethnicity	All Students (DataQuest)	
All	13,761	
Black	1,064	7.73%
Hispanic	12,157	88.30%
White	139	1.01%

PUSD ENROLLMENT – GENERAL AND SPECIAL EDUCATION

Ethnicity	All Students (PUSD)	Number of students - GE (PUSD)	% of student population - GE	Number of students – Sp Ed	% in special education
All	13,815	12,146	88%	1669	12%
Black	1,089	879	81%	210	19%
Hispanic	12,187	10,800	89%	1387	11%
White	140	116	83%	24	17%

Summary of DATA Analysis Findings

1. Over representation of 2 ethnic groups
 1. The percentage of Black students in the district = 7.73% compared to Black students receiving Special Education = 19%
 2. The percentage of White students in the district = 1.01 % compared to White students receiving Special Education services = 17%
2. The underutilization of 504 Plans, .01% of the student population compared to 12% SWDs.
3. The disproportionate number of Black students with OHI and those with ED who have a secondary disability of OHI. Is OHI a pathway to ED?
4. The number of male students (Black and Hispanic) with NPS placements. How soon are they placed after ED eligibility .
5. The Black student population proportionately has more students who are homeless, performs the lowest of all groups except ELs and SWDs in English and Math, has a high rate of absenteeism, and a low graduation rate. What systemic issues create these poor outcomes for the Black students?
6. More than 50% of both the Black and Hispanic males with ED are either in the general education setting 40% or less OR are placed in a nonpublic school (NPS).



Policies, Practices and Procedures Review

- The process of reviewing the Paramount Unified School District Policies, Practices, and Procedures included the use of the SPP TAP Policies, **Practices and Procedures (PPP) Review Matrix Tool**.
- Over 18 Board Policies or Administrative Regulations coupled with procedural manuals, and the district's website and department webpages were reviewed including the Local Control and Accountability Plan (LCAP) (PUSD PPP Matrix
- The Paramount Unified Strategic Plan 2017-2022 was also reviewed as part of the PPP review process.
- In conjunction with the district policies and dashboard data points and the PPP Survey, information Leadership Team **PPP Empathy Interview** data was also reviewed.
- A series of 20 questions were asked of each team members based on the main components of the policy and/or procedure on the matrix. The respondents understood that what they said would be confidential and any comments would be anonymous. The questions were based on the Policy Equity Analysis Tool. PPP Interview assisted with the development of possible root causes.



Policies Practices and Procedures - Findings

A Board Policy needs to be developed in the following area:

BP 6164.5 Student Study Team (SST)

Policy manuals and procedural handbooks need to be developed in the following areas:

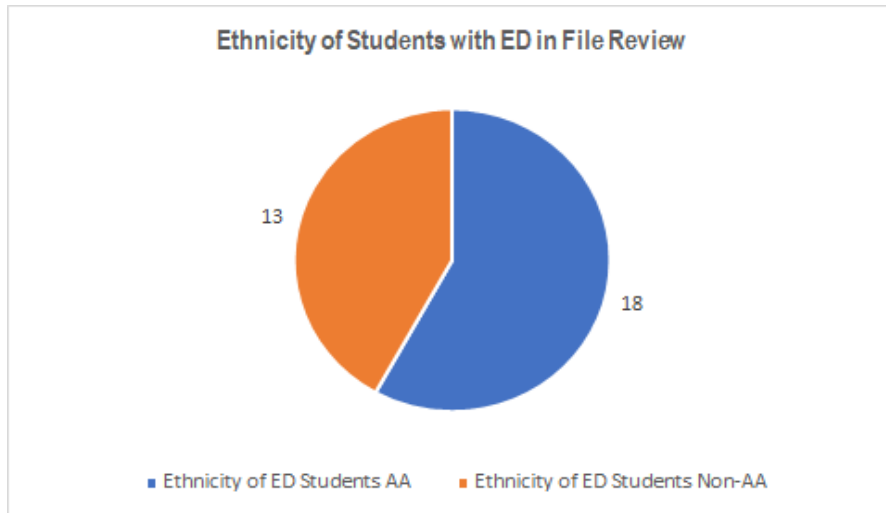
- Section 504 Manual
- SST Handbook
- PBIS/Social Emotional Learning and Behavioral Interventions
- MTSS Framework and Guidelines including interventions in the academic and social emotional areas.

The Special Education Handbook needs to be reviewed and revised.

File Review Data and Summary

The file reviews were conducted for 32 students who currently have IEPs under the eligibility of ED and 6 with Other Health Impaired (OHI).

This section concludes with a summary of the responses of the reviewers to 10 discussion questions.



Summary of Findings from File Reviews:

1. Most students had an initial assessment prior by 4th grade. The majority of students were eligible for ED, followed by OHI, SLI or SLD.
2. The non-AA students receive more pre-referral interventions. The reviewers concluded there is a need to provide more pre-referral interventions and for a longer period of time.
3. There is an underutilization of 504 Plans as a pre-referral intervention.
4. Discipline was a factor more often for African American students with ED.
5. More than 40% of both students with ED and African American students with ED are placed in a nonpublic school (NPS).
6. There is a need to include cultural factors in assessment reports. The majority of files indicated cultural factors had not been considered.
7. The OHI file reviews indicated students were assessed by 6th grade and 50% were eligible under OHI at the initial IEP.
8. The district is assessing many students in Preschool. There is a need to study interventions provided to young students before identification of ED.



***Complete a
Programmatic
Self-Assessment***

Qualitative Data

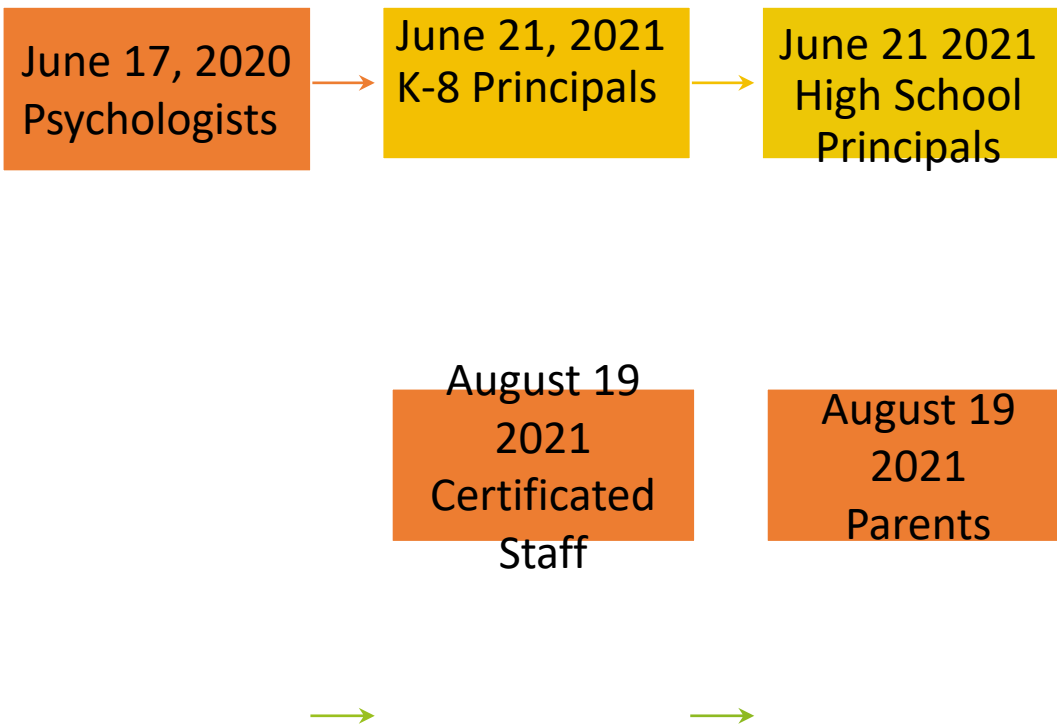
Self-Assessment

The Annotated Checklist
for Addressing Racial
Disproportionality in
Special Education

Developed by:
Dan Losen

- This checklist was designed as a tool to aid states and districts that are now required to analyze special education data, and take proactive steps to reduce racial disproportionality.
- Districts that have used it report that it does help educators analyze racial and ethnic disparities in special education identification, restrictiveness of setting and discipline, identify inappropriate policies and practices that may be contributing, and to design proactive early interventions to reduce such disparities, even where specific causes are not identified.
- Focus groups of representative roles in the district provide responses to questions related to disproportionality.

2021 Focus Groups



Root Causes a “pivotal conversation”

- The discussion around determining the root causes that will be addressed in the CCEIS Plan is pivotal to the process.
- It requires that LEAs take a **hard look** at what is causing the disproportionality. This hard look requires district leaders and stakeholders to accept the challenge of addressing the areas that are lacking/deficient in the district and create a plan to interrupt the continued pattern of disproportionality.
- The next 2 slides provides a **research based** list of examples of Root Causes that are common among districts.

NYUStienhardt: Steinhardt School of Culture,
 Education and Human Development
 Distinguishing Difference from Disability: The Common
 Causes of Racial/Ethnic Disproportionality in Special
 Education Dr. Edward Fergus, Metropolitan Center for
 Urban Education September 2010

“The examination of data for the last 6 years across 30 districts has resulted in our identification of **common root causes of disproportionality**. These causes are not the only ones but tend to be present in every district and maintain the **most significant effect** on the rate of disproportionality.”

Gaps in curriculum and instruction implementation	Limited Beliefs of Ability	Inconsistent Pre-referral Process
Minimal core curriculum	Poor and racial/ethnic minority students viewed as not ready for school	Inconsistent referral forms and process
Too many interventions	Special Education viewed as fixing students	Limited information on intervention strategies (MTSS,PBIS)
Poorly structured intervention programs		
Inconsistent knowledge of assessments		

Identifying the Root Causes of Disproportionality

New York University
Technical Assistance Center on
Disproportionality

METROPOLITAN CENTER FOR RESEARCH ON EQUITY
AND THE TRANSFORMATION OF SCHOOLS

Contributing Factors

- Discipline Policies & Practices
- Interventions and Referrals
- Instruction and Assessment
- Educational Opportunity
- Family and Community
- Bias, Teacher Expectations and Misconceptions
- Cultural Dissonance
- Sociodemographics

Cultural dissonance results in a district culture that lacks culturally responsive practices as evidenced by explicit and implicit biases.

Inconsistent discipline policies, procedures and practices has created a direct pathway to special education

Inconsistencies in the pre-referral process and Section 504 processes results in the over-identification

Lack of a consistent Multi-Tiered System of Support that includes evidence based interventions

Lack of early interventions to address Trauma

Lack of authentic partnership with African American parents and families

Potential
Root
Causes



NEXT STEPS

Phase III and IV

Finalizing Root Causes

Establishing Student Focus
(Target) Group

Measurable Outcomes and
Activities



Questions, Comments, or Ideas