

Office of the Independent Monitor
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Introduction

In September 2019, the Black Parallel School Board, along with three students, filed a lawsuit against the Sacramento City Unified School District (SCUSD or District) on behalf of all students with disabilities (SWDs). The lawsuit alleged that the District engaged in discriminatory practices towards these students, including segregation into more restrictive settings, inappropriate disciplinary removals, insufficient provision of required supports and services, and instances of bullying and harassment. The complaint specifically highlighted concerns regarding these practices affecting Black students with and without disabilities.

In May 2023, the parties agreed to a Settlement Agreement which included specific terms to guide systemic reform, including but not limited to 22 directives to address systemic issues, a five-year monitoring period, appointment of an Independent Monitor (IM), and an Action Plan developed by the IM with performance baselines and data-based outcomes to guide reform efforts.

In September 2023, Dr. Gregory Peters was designated as IM and subsequently developed an Action Plan in September 2024. The Plan primarily addressed procedural actions, lacked baseline measurements, and did not establish data-driven outcomes, resulting in limited progress. In November 2025, the Parties mutually decided to appoint a new monitor, Dr. Jaime E. Hernandez. During this transition, the IM was assigned responsibility for establishing baselines, formulating outcome measures based on data, and conducting a comprehensive review of both progress and the sufficiency of the existing Action Plan.

The Updated Action Plan fulfills the mandate of the transition period and provides the results of an extensive review of district policies, procedures, and practices, along with established baselines and 21 data-driven outcomes.

These outcomes are structured to enhance district performance to acceptable standards, using benchmarks such as state or federal averages. The proposed outcomes intentionally do not address reductions in risk ratio due to the impact an intervention aimed at reducing a specific event may have on risk ratio measures. For example, if reductions in OSS occur for all groups similarly, disproportionate overrepresentation will persist. In addition, an unintended consequence for reducing outcomes with risk ratio is to observe an increase in OSS for underrepresented groups, which is unethical and undesirable.

Furthermore, the Updated Action Plan incorporates disengagement criteria intended to guide the removal of court oversight, particularly when the district does not meet certain targets but demonstrates significant progress.

The Updated Action Plan is organized into seven sections to report baselines, data-based outcomes, and Action Plan requirements in each area. The sections address the following:

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- Section 1. Disciplinary Removals, Law Enforcement Referrals, Restraints and Seclusions and Provision of Behavioral and Mental Health Supports
- Section 2. Disproportionate Representation in Special Education and Specific Eligibility Categories
- Section 3. Least Restrictive Environment – Placements in more restrictive settings of 40% or less in the general education setting and Separate Schools
- Section 4. Compliance with IEP Timelines, Parent Participation at IEP Meetings, and Interpretation and Translation of IEP Meetings and Documentation
- Section 5: Multi-tiered Systems of Supports (MTSS), including Reading Intervention Teachers (RITs) and Bullying and Prevention Programs
- Section 6: Recruitment and Retention of Staff
- Section 7: Data Governance and Accountability

The purpose and objectives of each item are detailed in the table, ensuring alignment with the overarching aim of enhancing systemic capacity through the methods outlined below.

- Develop new policies and procedures, or modify existing policies and procedures, to ensure compliance with federal and state laws and regulations and employ best practices;
- Establish a reliable data system that documents, stores, and tracks data in all areas outlined in the Action Plan;
- Implement accountability mechanisms for staff, who inappropriately and/or disproportionately impact SWDs and Black SWDs in all areas outlined by the Action Plan;
- Implementing mechanisms to timely notify parents and guardians of the removal, restraint and referrals to law enforcement;
- Substantially reduce the number of removals and the disproportionate rates of disciplinary removals, including disciplinary transfers, of SWD and Black SWDs;
- Substantially reduce the number of referrals and disproportionate rates of referrals of SWDs and Black SWDs to law enforcement;
- Substantially reduce the number of incidents involving restraints and the disproportionate rates of restraints on SWDs and Black SWDs
- Substantially increase behavioral and mental health supports, services, and assessments offered to SWDs to address disability-related behaviors, such as Behavior Intervention Plans (BIPs), counseling services, and Functional Behavioral Assessments (FBAs)

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- Substantially reduce rates of more restrictive placements in the 40% or less in general education LRE category and separate schools
- Develop capacity by establishing a training program that includes the identification of competent trainers and training schedule for all relevant staff.

The timeframe of September 30, 2031, included on proposed outcomes, are based on the negotiated extension of the compliance period agreed to by the Parties. Although the previous iteration of the Action Plan did not require the district to develop an Implementation Plan, district leadership committed to this mechanism prior to the transition to the IM. This mechanism is a sound method for planning the development and implementation of actions based on shorter timeframes enabling closer monitoring of progress as well as adjustments to strategies that may not yield intended progress. It is critical that the district submits a sound and well-thought-out Implementation Plan within the required timelines to maximize implementation of initiatives early in the 2026-27 school year.

All Action Plan requirements are contingent upon IM approval, and the Implementation Plan must include adequate timeframes for thorough review and authorization.

The district is required to prepare an 18-month Implementation Plan within 90 days following the issuance of this Updated Action Plan. Upon submission, the Plaintiffs will be allotted 10 days to provide feedback to the IM. After receiving Plaintiff feedback, the IM will have 10 days to review and either provide further comments or approve the Implementation Plan. To ensure prompt approval, it is recommended that the district submit draft sections of the Implementation Plan for IM review and input during the 90-day development period. Throughout the compliance period, the district must also provide updated Implementation Plans, which will undergo the same review and feedback procedures as described above.

The initial Implementation Plan should concentrate on establishing core capabilities and systems by formulating and updating policies, procedures, program frameworks, data governance protocols, and a comprehensive training schedule. Additionally, it should support the progression of ongoing implementation initiatives.

The IM will utilize the following criteria for determining disengagement from court oversight in instances where the district has made demonstrable progress on meeting outcome targets and implementation of Action Plan requirements as well as the commitments made in its Implementation Plan but failed to meet all performance targets prescribed. The following criteria are consistent with generally acceptable standards of investigation and resolution used for complaints under Section 504 and IDEA.

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The district must demonstrate the following:

- Data system capable of monitoring key compliance and performance indicators at the District and school level
- Process for monitoring compliance and performance at the school level
- Management and administrative structure with the authority to monitor and enforce compliance

The district must also demonstrate clear standards for the correction of deficiencies or noncompliance identified that:

- Call for the immediate cessation of the violation
- Initiate steps to prevent recurrence
- Identify actions to correct the violation
- Identify documentation and timeline for correction
- Eliminate or cure any harmful effects of the violation

Methods Overview

The comprehensive review utilized both quantitative and qualitative data to guide the development of the Action Plan, establish current baseline performance, identify data-based outcomes, and determine additional requirements. To provide clarity on the review process, the following section summarizes the methods employed.

The review assessed a wide array of data sources to evaluate whether areas—such as removals, restraints, law enforcement referrals, special education identification, and the delivery of special education supports, services, and assessments—to determine the impact on students with disabilities (SWDs) and Black students. Additionally, data were disaggregated by race and ethnicity to determine the presence of disproportionality within these areas.

The primary sources of data included the student information system known as Infinite Campus (IC) and the special education data system SEIS. These systems were used to establish baseline performance metrics. To ensure the reliability and accuracy of the information, central office and site-level documents were also reviewed. These additional documents served to validate the records maintained in IC and SEIS and, when necessary, supplemented the data to provide the most precise counts of relevant events.

The review examined the following data but was not limited to:

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- End-of-year (EOY) enrollment file with 40,502 total population, with 32,916 general education students and 7,586 SWDs. These enrollment figures were used for establishing baselines and calculating overrepresentation and disproportionality for Sections 1, 2 and 3.
- Out-of-school suspension data reported in the student information system Infinite Campus for a total of 2,147 students and 3,535 suspension events.
- In-school suspension data reported in the student information system IC, for a total of 644 students and 933 suspension events.
- Other means of correction data for 1,998 instances
- Expulsion and disciplinary transfer data for 890 students
- Law enforcement referral data reported in IC and other documentation provided, such as the Safe School's Call Tracking and Logs totaling 132 referral events
- Restraint data from various sources, including IC, for a total of 105 restraint events
- Seclusion data from various sources, including IC, for a total of 30 seclusion events
- A file review of 71 behavioral emergency reports (BERs)
- A file review of 123 manifestation determination review IEPs for 123 students
- A review of select school-level Safety Plans
- A telephone survey of 91 families out of a sample of 180 special education students regarding the disciplinary experiences of their child, as well as their perceptions of the effectiveness of the suspension and the equitable treatment of students when administering suspensions.
- A telephone survey of 83 families out of a sample of 195 special education students regarding IEP meeting practices, their level of involvement, interpreter and translation services, as well as parent satisfaction with their child's schooling.
- Staffing information related to behavioral and mental health providers, including school psychologists and social workers providing ERMHS.

Qualitative data for this review were gathered through a comprehensive process that included document analysis, site visits, and interviews with both central office and site-level staff. Eight site visits were conducted, covering a range of educational settings: three elementary schools, two middle schools, two comprehensive high schools, and the John Morse Therapeutic Center, which serves as the district's special education center. These visits took place over two periods, January 27–29, 2026, and April 13–17, 2026.

The purpose of these site-visit interviews was to gain an in-depth understanding of school-level practices relating to disciplinary removals, including out-of-school suspension (OSS) and in-school suspension (ISS). In addition, the interviews explored practices

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concerning law enforcement referrals, the use of restraints, the roles and responsibilities of Safe Schools staff, and documentation procedures. The discussions also examined the process for Student Success Team (SST) referrals and special education referrals, as well as the implementation of Multi-Tiered System of Supports (MTSS). These efforts included analysis of social-emotional, behavioral, and academic interventions available at the sites.

Four focus groups were held with teams at the school level. Each group was composed of a special education coordinator, a department chair or case carrier, a school psychologist, and a counselor or social worker responsible for providing social-emotional and behavioral support. The focus groups included representatives from elementary, middle, and high schools.

These discussions aimed to learn about a range of site-level practices, including handling disciplinary removals such as in- and out-of-school suspensions, expulsions and transfers, law enforcement referrals, and the use of restraints. The focus groups also addressed issues related to Individualized Education Program (IEP) meetings, specifically compliance with timelines for initial, annual, and triennial reviews, service delivery, Manifestation Determination Reviews (MDR), and efforts to increase participation of students with disabilities alongside their general education peers. Additional topics included language access, parent participation, the implementation of MTSS and Positive Behavioral Interventions and Supports (PBIS), overall intervention programs, and procedures for data recording and utilization to inform and improve school practices.

A total of 164 central office and site-level staff participated in structured interviews and focus groups that were conducted over several days during January, February, and April. These sessions focused on a variety of topics relevant to both general and special education, including data management and reporting, disciplinary removals such as out-of-school suspension (OSS), in-school suspension (ISS), expulsions, and disciplinary transfers.

Additional areas of discussion included bullying, the roles and responsibilities of Safe Schools staff, efforts related to Multi-Tiered System of Supports (MTSS), the use of restraints, timely completion of Individualized Education Programs (IEPs), parent participation in educational processes, as well as special education and mental health services.

Central-level interviews and focus groups included staff from a broad range of departments, such as Bully Prevention, Student and Hearing Placement, the Discipline Reform Committee, Technology Services, Special Education/SELPA, Human Resources, MTSS, College and Career Readiness, Student Support and Health Services, Multilingual Literacy, the Matriculation and Orientation Center, Curriculum and Instruction, and Safe Schools. Site-level interviews and focus groups involved staff in various positions, including Resource Specialist Program (RSP) teachers, Special Day Class (SDC) teachers, reading intervention teachers, Safe School leads, occupational therapists, speech and language pathologists, school psychologists, Board Certified

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Behavior Analysts (BCBAs), Behavior Intervention Specialists, and social workers or providers of Educationally Related Mental Health Services (ERMHS). Principals from elementary, middle, and high schools also participated in focus group discussions.

To gain further insight into site-level practices and experiences of students who had undergone disciplinary removal—including at least one OSS, as well as ISS, law enforcement referrals, or the use of restraints—a telephone survey was conducted with 91 families during the week of March 16–20, 2026. The survey aimed to gather families’ perspectives on the effectiveness and fairness of the disciplinary procedures implemented by schools.

A phone survey was conducted to better understand the level of parent engagement during the Individualized Education Program (IEP) meetings and the decision-making process concerning students’ special education services and placement. Out of a sample of 195 families of special education students, 83 parents participated in the survey. The focus of this survey was to capture parents’ experiences and perspectives regarding their involvement in the IEP process, including how decisions about their child’s educational services and placement were made.

The review encompassed a broad range of documents, including but not limited to, district policies and regulations, training materials, procedural manuals, materials produced by the MTSS design team, and memoranda of understanding (MOUs) between the District and the Sacramento City Teachers Association (SCTA).

Methods for Examining Overrepresentation and Disproportionality

To examine disproportionality, District data were reviewed to determine whether specific racial/ethnic groups were more susceptible to overrepresentation in various aspects of the Settlement Agreement. To calculate disproportionality, good-quality and accurate enrollment data are necessary to obtain the best estimates of overrepresentation. Inflated enrollment figures can impact disproportionality measures since the denominator used to determine proportionate representation results in lowering the risk and risk ratio of a specific student group, potentially minimizing the impact of the overrepresentation. Conversely, an underestimated number of students in the enrolled population can result in higher risk and risk ratios, leading to the appearance of greater disproportionality.

In addition, data were analyzed to examine if disparities existed for SWDs and Black SWDs and the extent of the overrepresentation found. Although the primary focus was on SWDs, general education student data were also reviewed to enable comparisons between SWDs and general education students, as well as determining if disproportionality exists.

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The Action Plan requires the establishment of baseline performance, which includes the identification of disparities between SWDs and nondisabled students, as well as Black SWDs and non-Black SWDs. To determine if disproportionality exists and its extent, a review of general and special education data was conducted. Determining overrepresentation and disproportionate overrepresentation requires comparisons of outcomes for one racial/ethnic student group against another student group, or in many cases, all other racial/ethnic student groups combined.

The California Department of Education (CDE) defines disproportionality as the overrepresentation of a specific race or ethnicity identified in one or more of four areas: identification of a disability in general, identification of a specific race or ethnicity in a specific disability category, discipline, and placement.

The State set the relative risk ratio threshold for determining significant disproportionality at 3.0 meaning that a risk ratio that meets or exceeds the 3.0 threshold indicates significant disproportionality. For example, if SWDs demonstrate a n out-of-school suspension (OSS) risk ratio of 3.0, this means that SWDs are three times more likely to experience an out-of-school suspension than nondisabled students. For the purpose of this review, findings of risk ratio thresholds of 2.0 are referred to as disproportionate overrepresentation.

The State also may find school districts with Significant Disproportionality (capitalized), when districts demonstrate a risk ratio of 3.0 or more after three consecutive years. This designation triggers specific interventions and redirection of special education funding to address disproportionality.

To determine if disproportionate representation exists with special education identification for different racial/ethnic groups, three measures were used to calculate disproportionality: composition index, relative risk, and relative risk ratio. The composition index (CI) is a basic measure to indicate whether over- or underrepresentation is present. It refers to the proportion of a group with the same characteristics, such as demographics, within a population. The risk or relative risk is a within-group comparison that identifies the risk or odds that students within that racial/ethnic group will be identified for special education.

The last measure used is the relative risk ratio, which compares the risk of one student group to the risk of all other student groups. This measure best shows the extent and impact of disparities between racial/ethnic groups experiencing an outcome—in this case, a special education identification. For a more precise view of disproportionate overrepresentation, risk ratios are reported to two decimal places.

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This review applies the Washington Department of Education's¹ thresholds to identify disproportionate over- and underrepresentation and significant disproportionality. These thresholds are also consistent with literature that identifies risk ratios of 2.0 and over as being disproportionate (Parrish, 2002).

- Disproportionate underrepresentation: ≤ 0.5
- At risk for disproportionate underrepresentation: >0.5 to <0.67
- No disproportionate representation: ≥ 0.67 to ≤ 1.5
- At risk for disproportionate overrepresentation: >1.5 to <2.0
- Disproportionate overrepresentation: ≥ 2.0 to <3.0
- Significant disproportionality: ≥ 3.0

The Action Plan considers risk ratios of 2.0 and over as indicative of disproportionate overrepresentation and risk ratios of 3.0 and over as being significantly disproportionate.

Risk ratios are determined by dividing the risk of the target group (e.g., Black SWDs) by the risk of the comparison group (e.g., all other non-Black SWDs) for a specific event (e.g., suspension), as shown below:

Risk of Target Group: $\frac{\text{\# of Black SWDs suspended}}{\text{\# of Black SWDs enrolled}} \times 100$
Risk of Comparison Group: $\frac{\text{\# of all other non-Black SWDs suspended}}{\text{\# of all other non-Black SWDs enrolled}} \times 100$

¹ <https://www.k12.wa.us/student-success/special-education/program-improvement/significant-disproportionality>

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Section 1. Disciplinary Removals, Law Enforcement Referrals, Restraints and Seclusions and Provision of Behavioral and Mental Health Supports

This section encompasses three parts related to disciplinary actions and behavioral and mental health supports provided to students with disabilities (SWDs) and Black SWDs. This first part provides a thorough analysis of exclusionary disciplinary removals affecting both general education and special education students. The scope of the review encompasses a variety of disciplinary actions, including out-of-school suspensions (OSS), in-school suspensions (ISS), long-term removals that total ten or more cumulative days, expulsions, and both involuntary and voluntary disciplinary transfers.

The analysis also evaluates the implementation of manifestation determination reviews (MDR) for students who are subject to long-term removals. Specifically, it examines whether schools adhered to required procedures to assess if a student's misconduct was a manifestation of their disability or was directly related to the school's failure to implement the student's Individualized Education Program (IEP). The review further considers whether any additional supports were recommended or added to the student's IEP as a result of the MDR process.

Additionally, this section includes a review of disciplinary school removals such as expulsions, as well as disciplinary transfers (voluntary/involuntary) and changes in student placement following behavior hearings. The intent is to identify and understand disparities in disciplinary outcomes between general and special education students, and particularly between Black students with and without disabilities as compared to their non-Black peers.

The district reports a high rate of disciplinary referrals and removals across student populations, with students with disabilities (SWDs) and Black students—both with and without disabilities—experiencing a disproportionate share of these actions. Discipline data indicate that these groups are overrepresented across the areas reviewed, including out-of-school suspensions (OSS), in-school suspensions (ISS), other means of correction (OMCs), disciplinary transfers, and long-term removals totaling ten or more cumulative days. These patterns indicate persistent disparities in disciplinary outcomes, with SWDs and Black students removed from the educational environment at higher rates than their peers.

Although risk ratios in some areas signal disproportionate overrepresentation and significant disproportionality for SWDs, and Black students with and without disabilities, these measures were tempered due to high rates of removals observed for most student groups. Therefore, overrepresentation and disproportionate impact must be viewed by comparing rates or risk of student groups and targeting interventions that aim to reduce the risk of SWDs and Black SWDs.

The district's elevated suspension rates reveal significant structural challenges and inefficiencies within the educational system. The frequent reliance on out-of-school removals as a primary response to student misconduct highlights administrative

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shortcomings, particularly in staff training and the provision of essential structural supports. A lack of sufficient alternative interventions and corrective strategies exacerbates this issue, leading to the overuse of suspensions and failing to promote more effective approaches for addressing student behavior.

Across multiple areas, the review identified limitations in data accuracy and gaps in districtwide data collection, maintenance, and reporting. There was significant underreporting or a lack of centralized data regarding law enforcement referrals, restraints, behavior hearings, discipline transfers (including both voluntary and involuntary), and manifestation determination reviews. These deficiencies in data management further hinder the district's ability to accurately assess and address disciplinary practices.

Interviews with both central office and site-level staff revealed that the district has developed a culture that heavily depends on disciplinary removals. Staff attributed this tendency to several underlying factors, including the absence of policies and procedures in the district. Additionally, staff noted that available tiered supports are both limited and underdeveloped, restricting their ability to provide effective behavioral interventions. The lack of comprehensive staff training and capacity in areas such as classroom management, implementing non-punitive interventions, and distinguishing between disability-related behaviors and general misconduct further exacerbates the reliance on exclusionary practices.

Staff also acknowledged notable inaccuracies in discipline data reporting. There is a prevalent culture of underreporting disciplinary actions and removals, driven by a desire to avoid negatively impacting a student's record and to keep school discipline rates artificially low, particularly for Black students. As a result, there is likely significant underreporting of disciplinary removals and actions throughout the district.

Staff expressed concerns regarding the district's requirement to conduct manifestation determination reviews (MDRs) for students with disabilities (SWDs) who reach six days of suspension. Several interviewees reported that additional training is needed to conduct MDRs consistently and in accordance with requirements. Limited training may affect the team's ability to make well-supported determinations and may increase the risk of inappropriate disciplinary actions or changes in placement for behaviors related to disability. Administrators also cited a lack of guidance for when the MDR determination concludes that the misconduct was related to the student's disability and the suspension had already been served, resulting in changes to the student's disciplinary record from offender to participant, to not affect their disciplinary record.

Administrators noted insufficient guidance on updating disciplinary records when the MDR finds misconduct was due to a student's disability after suspension has already occurred, resulting in changes from offender to participant or removing the offense from the record.

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The review of MDR IEPs identified notably low rates of behavioral and mental health supports, such as counseling and BIPs, included in the IEP of SWDs who experienced disciplinary removals and had an MDR. These low rates of behavioral and mental health interventions in IEPs reflect prevailing practices and an underlying culture that favors punitive disciplinary measures over meeting students' needs through appropriate support and interventions.

The review of the manifestation determination process revealed several concerning practices related to student discipline. One incident found a student being suspended and referred to a behavioral hearing for vaping which resulted in a disciplinary transfer or a change in the student's educational placement. Additionally, there were two cases where students faced suspension for refusing to comply with searches conducted by school staff. The review also found that the manifestation determination review process was used to justify referring students with chronic absenteeism to the School Attendance Review Board (SARB). These practices raise important questions regarding the consistent and appropriate application of disciplinary procedures, as well as the use of exclusionary measures for behaviors that may warrant alternative approaches.

To determine the number of expulsions and disciplinary transfers, several data sources were analyzed. These included discipline files, enrollment files, behavior hearing request forms, and what appeared to be a running list of behavior hearings held. Although the district provided 202 behavior hearing request forms, it could not be determined with certainty which requests resulted in a behavior hearing and what the outcomes were. The district also noted that the requests were incomplete because the electronic request form was only implemented starting in mid-October 2024.

A review of voluntary and involuntary transfer data also was conducted. These transfers are coded in CALPADS with a T 165 indicator which is designated for students who receive a disciplinary transfer while those coded with T167 are transferred to alternative placement such as a continuation school or independent study program for non-disciplinary as well as disciplinary reasons.

When cross-referencing these data sources, it became clear that the expulsion and transfer data was incomplete. For example, enrollment data revealed that 66 students accounted for the 69 disciplinary transfers identified, but only 31 of those transfers were linked to a behavior hearing request form. District staff explained that hearing outcomes can be found in folders managed by the Placement and Hearing Department. A review of these documents was underway by the district but had not been completed by the time of this report. This incomplete data leaves too many assumptions, such as the possibility that school administrators might circumvent the behavior hearing process to transfer students to different schools.

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A detailed review of behavior hearing request forms and the corresponding records of hearings conducted indicated that not every submitted request resulted in an actual behavior hearing. This finding highlights a disconnect between the formal process and its implementation, suggesting variability in how requests are processed and acted upon.

Interviews with school staff provided insight into differing perspectives regarding the behavior hearing process. One staff member expressed the view that submitting a behavior hearing request form almost guarantees that the student will be moved, implying that outcomes may be predetermined and the process lacks objectivity. Conversely, another staff member characterized the process as fair to students, indicating a belief in its impartiality and proper procedural conduct.

The differing perspectives among staff members regarding the behavior hearing process highlight the pressing need for increased clarity, consistency, and transparency in the district's approach to student discipline. These variations in perception suggest that current procedures may not be uniformly understood or applied, potentially affecting the equitable treatment of students and undermining trust in disciplinary outcomes. In addition, the district does not have established policies governing both voluntary and involuntary student transfers. This lack of formal guidance may contribute to inconsistencies in practice and result in inadequate documentation of transfer decisions. Addressing these issues is essential to ensure fairness in the disciplinary process and to support a culture of accountability and trust within the school community.

Analysis of expulsion data indicates that the district's expulsion rates for both students with disabilities (SWDs) and general education students are lower than the state average of 0.1%. This suggests that expulsions are not a primary disciplinary measure within the district. However, disciplinary transfer rates present a significant area of concern. Special education students face a disciplinary transfer risk of 2.4%, while general education students have a risk of 1.7%.

Although risk ratios do not currently indicate disproportionality between student groups, the quality of available data remains insufficient. Poor administrative oversight and numerous reports from staff highlight prevalent practices that result in students being informally transferred without proper documentation or oversight.

Due to these concerns, it is necessary to implement a comprehensive database to track outcomes and ensure accountability. The use of disciplinary transfers will be subject to close monitoring and increased scrutiny to accurately determine the extent of such transfers within the district and to address any underlying issues related to informal and formal disciplinary transfers.

Surveys regarding disciplinary practices were administered to 91 families selected from a sample of 180. Participants were chosen based on whether their student had experienced a disciplinary removal during the 2025-26 school year; however, in cases where parents were unaware of their child's in-school or out-of-school suspension, replacements were made in the sample. When

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queried about informal suspensions, 15.4% of respondents indicated their child had been informally removed, while 38.5% expressed uncertainty. Some families described scenarios where they were contacted by the school to pick up their child due to behavioral concerns.

The survey examined instances of students being subjected to restraints and searches on campus. More than one third of parents reported that their child had been searched, with the highest rates observed among Black (36.4%) and Hispanic (41.4%) students. By comparison, 28.6% of White students and 20.0% of students from other racial groups reported being searched. In addition, 26.4% of families indicated that their student had been restrained by school staff. Black students experienced the highest proportion of reported restraints at 36.4%, followed by Hispanic students at 27.6%. Students grouped as other races reported restraints in 20.0% of cases, while White parents reported the lowest incidence at 7.1%.

The survey evaluated parents' perceptions of the effectiveness of the school's disciplinary methods in addressing student behavior or misconduct. Results indicated that 35.2% of parents disagreed, while 19.8% strongly disagreed with the effectiveness of assigning removals as a deterrent. Moreover, 64.8% of respondents did not believe school officials adequately considered their child's disability when implementing disciplinary measures. Additionally, 39.6% of parents felt students were not treated equitably in disciplinary actions regardless of race or ethnicity, and 11% expressed uncertainty regarding fairness.

The Action Plan mandates the creation or revision of policies and procedures that will guide administrators in handling student discipline. Administrators are required to first consider and prioritize alternatives to suspensions or other means of correction (OMCs) as required by law. The plan emphasizes the use of a uniform decision-making process that objectively and equitably determines whether in-school or out-of-school suspensions are appropriate. This process includes the development of a behavior matrix and/or a sequential discipline guide, which employs a progressive approach to discipline. The overall focus is on providing students with behavioral and mental health interventions, rather than relying on punitive measures. Additionally, the plan calls for the establishment of clear policies regarding disciplinary transfers, including both voluntary and involuntary transfers that result from behavior hearings or site-level decisions.

To change culture and practice from punitive measures to address a student's needs through increased behavioral and mental health supports, schools will be required to hold an IEP when a student has been removed two or more times, or for six or more days. During these IEP meetings, the school must consider and implement additional behavioral and mental health supports for the student. This includes increasing the level of support provided and, when appropriate, initiating referrals for functional behavioral assessments (FBAs). By implementing these measures, schools aim to provide tailored interventions that address the underlying needs of students, reducing reliance on exclusionary disciplinary actions and promoting a supportive educational environment.

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The district is required to address structural deficiencies to ensure that students receive the behavioral and mental health support necessary to manage their behavioral and social-emotional challenges. This includes the implementation of well-defined tiered supports, effective instructional programs, and general education interventions. The Action Plan also highlights the importance of structured intervention activities that promote restorative practices, educational programs focused on teaching prosocial skills, and safe spaces where students can de-escalate and self-regulate. The goal is for schools to be adequately equipped to meet students' needs and to facilitate their return to instructional programs as promptly as possible.

To facilitate systemic change and ensure the consistent and equitable application of disciplinary practices, site administrators must be provided with necessary tools and resources. These include clear policies and procedures, standardized forms, and effective systems for data collection, maintenance, and reporting. Additionally, comprehensive training and ongoing support are required to help administrators implement the requirements outlined in the Action Plan.

Baseline Performance

Analysis of removal data from the 2024–25 school year revealed notable patterns of disproportionate overrepresentation and significant disproportionality for students with disabilities (SWDs) and Black students, both with and without disabilities, across multiple disciplinary categories. This data-driven analysis established critical baseline performance measures, serving as reference points for evaluating progress over time and informing the development of data-based outcomes. These outcomes were instrumental in shaping the requirements detailed in the Action Plan, ensuring targeted interventions that address the observed disparities in disciplinary practices.

The following are baseline performance measures related to student discipline:

Out-of-School Suspensions (OSS)

Out-of-school suspensions (OSS) refer to the removal of a student from the school environment for disciplinary reasons, resulting in the student being prohibited from attending school for a specified period. For context, the state average for one-time suspension rates stands at 2.9%. Additionally, the California Department of Education (CDE) employs the Suspension Rate Indicator, classifying any suspension rate exceeding 6.1% as “Very High,” which is the highest designation available.

Overall (Combined General and Special Education) OSS Removals

- During the 2024–25 school year, a total of 2,147 students experienced at least one out-of-school suspension. These suspensions resulted in 3,535 separate disciplinary events

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- General education students accounted for 71.3% of all students who experienced at least one removal from school and represented 66.1% of all OSS events
- Special education students comprised 28.7% of all students who experienced at least one OSS and represented 33.9% of all events. This figure demonstrates that special education students are overrepresented in OSS incidents when compared to their overall proportion of the student population (18.7%)
- The district's overall OSS suspension rate stands at 7.9%, which is significantly higher than both the state average of 2.9% and the California Department of Education's "Very High" suspension rate indicator of 6.1%
- Black students, both with and without disabilities, have an OSS rate or risk of 13.7%, which is 42.3% higher than the overall district rate
- American Indian/Alaskan Native students, with and without disabilities, have an OSS rate or risk of 11.7

General Education OSS Removals

- A total of 1,531 general education students received at least one OSS, totaling 2,335 events
- General education students' risk for experiencing at least one OSS is 4.6%, which exceeds the state average of 2.9%
- Black general education students' risk is 12.6%, indicating that 12.6 out of every 100 Black nondisabled students are likely to receive at least one OSS. This risk is the highest among all non-disabled student groups by race or ethnicity
- Black students have a risk ratio of 3.34, which is indicative of significant disproportionality. This means Black general education students are 3.34 times more likely to be removed from school than their non-Black peers.
- American Indian/Alaskan Native general education students' risk for experiencing OSS is 10.6%
- This group demonstrates a risk ratio of 2.29, which is consistent with disproportionate overrepresentation
- In contrast to the high rates of OSS observed among Black and American Indian/Alaskan Native student groups, White, Asian, and Filipino general education students display significantly lower risks. Specifically, White students have a risk of 2.5%, Asian students have a risk of 2.4%, and Filipino students have a risk of 1.7%. Each of these rates is below both the state average of 2.9% and the district rate of 4.6% for general education students

Special Education OSS Removals

- A total of 616 special education students received at least one OSS, totaling 1,200 events
- Special education students have a risk of experiencing an OSS at 8.1%, which exceeds the state's "Very High" indicator of 6.1%
- Students with disabilities (SWDs) have a risk ratio of 1.77, which is consistent with being at risk for disproportionate overidentification
- Black SWDs have an OSS rate or risk of 16.3%, which is more than twice the risk for SWDs overall
- This group demonstrates a risk ratio of 2.59, consistent with disproportionate overrepresentation

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- American Indian/Alaskan Native SWDs have a risk of 14.5%
- Their risk ratio is 1.65, consistent with being at risk for disproportionate overrepresentation
- The district's elevated suspension rates impact risk ratio calculations for student groups. Multiple groups exhibit high OSS rates which results in disproportionality remaining comparatively modest. Nevertheless, the composition index and/or identified risk demonstrate distinct overrepresentation of OSS relative to both their enrollment proportions and the state average

In-School Suspensions

In-school suspensions (ISS) are disciplinary actions that remove students from their regular classroom environment and exclude them from participating in school-wide activities, including recess and lunch.

Overall ISS Removals

- During the 2024-25 school year, 644 students received an ISS, resulting in 933 events
- General education students comprised slightly over two-thirds (69.7%) of those who received in-school removals, while students with disabilities (SWDs) accounted for 30.3% of such removals
- The overall rate or risk of experiencing an in-school suspension (ISS) is 1.6%

General Education ISS Removals

- A total of 449 general education students experienced an ISS for a total of 633 events
- The rate or risk for general education students experiencing an ISS is 1.4%
- Black students face a risk of 3.8%, which is more than twice the overall rate
- The risk ratio is 3.46, indicative of significant disproportionality. This demonstrates that Black general education students are nearly 3.5 times more likely to receive an ISS compared to their non-Black peers
- All other student groups have a rate or risk at or below the district rate of 1.4%

Special Education ISS Removals

- A total of 195 SWDs received at least one ISS for a total of 300 events
- Special education students' risk of ISS is 2.6%
- Black SWDs' risk of experiencing an ISS is 5.4%
- Their risk ratio is 2.76, consistent with disproportionate overrepresentation
- American Indian/Alaskan Native students' risk is 9.7%

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- Their risk ratio of 3.54, indicative of significant disproportionality

Combined Suspension Rates

The state determines overall suspension rates by incorporating both out-of-school suspensions (OSS) and in-school suspensions (ISS) into a single combined metric. By aggregating these two types of disciplinary removals, the calculation provides a more accurate and comprehensive representation of the number of students excluded from their regular educational setting. This approach ensures that all instances of student removal are counted, whether the disciplinary action results in removal from the school building or placement in an alternative setting within the school itself.

Overall Combined (OSS and ISS) Removals

- A total of 2,488 students experienced an OSS, ISS or both types of removals, for a total of 4,467 combined events
- The district's overall suspension rate is 6.1%, which is more than double the state average of 2.9% and meets the threshold for the "Very High" indicator at 6.1%

General Education Combined Removals

- A total of 1,786 general education students received a disciplinary removal of OSS and/or ISS, for 2,967 events
- General education students report a combined suspension rate of 5.4%
- Among Black general education students, the suspension rate is 14.6%, with a risk ratio of 3.33, indicative of significant disproportionality
- American Indian/Alaskan Native students' suspension rate is 10.6%, with a risk ratio of 1.96, consistent with being at-risk for disproportionate overrepresentation
- Hispanic, Multiple races, and Native Hawaiian/Other Pacific Islander students exhibit suspension rates at or near or slightly above the district rate of 5.4%, exceeding the state average of 2.9%

Special Education Combined Removals

- A total of 702 special education students received a disciplinary removal of OSS and/or ISS, for 1,500 events
- Special education students show a combined suspension rate of 9.3%
- The risk ratio for special education students is 1.71, consistent with being at risk of disproportionate overrepresentation
- Black students in special education experience a suspension rate of 18.7%, accompanied by a risk ratio of 2.62, also indicative of disproportionate overrepresentation
- American Indian/Alaskan Native special education students report a suspension rate of 17.7% with a risk ratio of 1.77, consistent with being at risk for disproportionate overrepresentation

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- Multiracial special education students have a suspension rate of 11.1%, significantly higher than the state average; however, their risk ratio of 1.23 does not indicate overrepresentation
- All student groups aside from Asian students (3.0%) demonstrate a suspension rate above 6.1%, ranging between 6.3% and 8.6%. The Asian student group exceeds the state average of 2.9%

Long-Term Disciplinary Removals of 10 or more days

Students with disabilities are safeguarded from long-term disciplinary removals that may lead to a change in their educational placement. When such removals occur, a manifestation determination review (MDR) IEP meeting is required. For the purposes of triggering a manifestation determination review, both out-of-school suspension (OSS) and in-school suspension (ISS) must be counted when calculating the cumulative length of disciplinary removals, as required by special education law and state regulations.

Due to the district's current agreement to hold MDRs for SWDs removed 6 or more days, data were reviewed examining student removals at both timeframes of 6 or more days and 10 or more days.

General Education Long-term Removals

- Out of all general education students, 156 individuals (8.7%) experienced long-term removals lasting 10 or more days
- The risk of long-term suspension among general education students stands at 0.4%
- Black general education students face a significantly higher risk of 1.7%
- The risk ratio is 5.02, indicative of significant disproportionality; Black general education students are 5.36 times more likely than their non-Black counterparts to be removed for 10 or more cumulative days

Special Education Long-term Removals

- Among special education students, 103 students (14.7%) experienced long-term removals of 10 or more days. Additionally, 28.1% of suspended SWDs were removed for six or more days, which necessitates a manifestation determination review
- The risk of long-term suspension for special education students is 1.4%
- The risk ratio of 2.86 consistent with disproportionate overrepresentation
- Black SWDs have a removal rate of 3.6% for 10 or more days
- The risk ratio for Black SWDs is 4.25, indicative of significant disproportionality
- All other student groups exhibited a rate or risk of 0.7% or lower

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Additional Findings

Loss of Instructional Days from OSS

- Suspensions resulted in a loss of 9,609 instructional days, for a loss of approximately \$380,000.00 in ADA revenue
- Special education students represented one-third (33.0%) of days lost (n=3,171), with all student groups (Black, Hispanic, Other) showing an average higher number of days removed than their non-disabled counterparts
- For SWDs, White students were the only group that noted less days of removals compared to their non-disabled counterparts (White SWDs 3.7 days vs. White general education 4.1 days)
- Black SWDs represent 42.0% of all days lost, averaging 5.9 days of removal compared to 4.7 days for non-Black SWDs

Number of Days Issued per OSS Event

- About a third of general (30.0%) and special education (32.3%) students suspension events were issued for one day (n=1,091 total events)
- About one-in-four (26.0%) general education suspension events, and one-in-five (21.4%) events for SWDs, were issued a five-day removal
- Black students with and without disabilities had the highest rates of five-day suspensions issued (Black general education - 27.6% and Black SWDs - 24.3%)
- Conversely, White students with and without disabilities showed the lowest rates of being assigned a 5-day removal (White general education – 22.7% and White SWDs -13.0%)

SWDs with OSS and/or ISS with Behavioral and/or Mental Health Supports, including Counseling, Behavior Intervention Plans (BIPs), Behavior Intervention Services, or Intensive Instructional Support (1:1 aide)

SWDs Removed with Behavioral and/or Mental Health Supports on their IEPs

- Of the SWDs suspended at least once (n=702), 255 (36.3%) had behavioral or mental health support as part of their IEP. This means that the majority of SWDs (63.7%) removed did not have any support in their IEP
- Counseling services were found for 20.5% of all SWDs suspended (OSS and ISS) at least one time
- Of those suspended, about one in four (n=162 or 23.1%) had a BIP as part of their IEP
- Few SWDs suspended at least once had 1:1 aides (8.4%) or behavioral intervention services (10.7%)

SWDs Removed with Behavioral and/or Mental Health Supports on their IEPs by Race/Ethnicity

- Black SWDs (n=258), 65 or 25.2% with counseling
- Hispanic SWDs (n=244), 41 or 16.8% with counseling

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- White SWDs (n=79), 19 or 24.1% with counseling
- Multiracial SWDs (n=14), 14 or 19.4% with counseling
- Other SWDs (n=48), 5 or 10.4% with counseling
- Black SWDs (n=259), 69 or 26.7% with BIPs
- Hispanic SWDs (n=244), 42 or 17.2% with BIPs
- White SWDs (n=79), 26 or 32.9% with BIPs
- Multiracial SWDs (n=14), 18 or 25.0% with BIPs
- Other SWDs n=48, 7 or 14.6% with BIPs

Other Means of Correction (OMC)

Other means of correction (OMC) serve as alternatives to suspension and are designed to address student behavior without resorting to exclusionary discipline. These interventions may include referrals to a counselor, Student Study Team (SST) meetings, or assessments for special education eligibility. Students may also participate in restorative sessions or engage in intervention activities such as educational programs focused on alcohol and tobacco prevention, or anti-bullying initiatives.

Overall OMCs

- A total of 1,998 instances of OMC were documented, with 1,014 including accompanying codes for OSS and/or ISS. This means that only 984 (49.2%) OMCs reported involved discipline or interventions serving as alternatives to suspension
- When combined with disciplinary referrals resulting in OSS or ISS, OMCs represented 14.5% of students and accounted for 22% of disciplinary events not leading to exclusionary removal. This indicates that only one in seven students subjected to a disciplinary referral received an alternative to suspension or OMC. Conversely, six out of seven students referred to a disciplinary incident received a removal

General Education OMCs

- The risk of experiencing an OMC among general education students is 1.1%
- For Black students, the risk is 3.3%, with a risk ratio of 4.12, indicative of significant disproportionality

Special Education OMCs

- Special education students have a risk of 2.1%, accompanied by a risk ratio of 1.99, which is consistent with being at risk for disproportionate overrepresentation
- Among Black special education students, the risk is 4.1%, with a risk ratio of 2.52, consistent with disproportionate overrepresentation

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Manifestation Determination Reviews (MDRs)

The Manifestation Determination Review (MDR) meeting is convened to bring together school staff and the student's family for a collaborative evaluation of the student's misconduct. The primary objective is to determine whether the behavior in question was substantially related to—or a direct manifestation of—the student's disability. The team also assesses whether the student's actions may have resulted from the school's failure to properly implement the IEP.

If the MDR team determines that the misconduct was not a manifestation of the student's disability and confirms that the IEP provided sufficient support and was implemented correctly, the school is permitted to move forward with disciplinary measures, which may include a change in the student's school placement. It is important to note that long-term suspensions have considerable consequences for students, including an extended loss of instructional time and significant disruption to the delivery of IEP services.

Findings from a review of 123 MDRs include:

- More than half of MDRs held were for Black students (n=65, 52.8%)
- Of the MDRs held, parents attend 78% of meetings
- Most were held within 10 days (n=107, 87.0%)
- About a third (n=43, 35.0%) of MDRs determined that the misconduct was a manifestation of the student's disability (42 total) or school's failure to implement their IEP (16 total). Six or 4.9% of the MDRs did not have any information related to the determination
- Of the parents who attended the MDR, 64.6% agreed with the determination made, 11.5% disagreed, while 24.0% of IEPs did not have any information related to a parent's agreement
- About half (52.0%) of students had a BIP prior to the MDR or had one added and/or revised at the meeting
- Half of Black students (50.8%) subjected to an MDR had a BIP
- Only eight students (6.5%) were recommended a functional behavioral assessment (FBA) at the MDR meeting
- About one in ten Black students (n=6, 9.2%) were offered an FBA as a result of the MDR
- For SWDs with 6 or more days of suspension, 61.4% (105 out of 171 students) had an MDR held
- A total of 23 or 18.7% of students had a placement change recommended with 13 or 10.6% recommending placement at a non-public school (NPS)

Expulsion and Voluntary/Involuntary Discipline Transfers

Expulsion data were reviewed; however, efforts to obtain comprehensive disciplinary transfer data were unsuccessful. Despite multiple requests for information regarding disciplinary transfers that resulted from behavior hearing reviews, the district was

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unable to provide data detailing student outcomes until the day before the release of the Updated Action Plan. Although baselines are included a full validation of the data could not be performed.

General and Special Education Expulsions

- 23 students were expelled during the 2024-2025 school year consisting of 7 SWDs and 16 general education students
- The expulsion rate for special education students is 0.09%, with a risk ratio of 2.34%, consistent with disproportionate overrepresentation
- 10 Black students (43.5%) were expelled consisting of 4 SWDs and 6 general education students
- 7 Hispanic students (30.4%) were expelled consisting of 2 SWDs and 5 general education students
- 6 students (26.1%) from other race categories were expelled consisting of 1 SWD and 5 general education students
- No White were students
- Of the 23 students expelled only 7 had a behavior hearing request form. No additional data exists regarding the remaining 16 students expelled

Overall Disciplinary Transfers (codes T165 and T167)

- A total of 867 students received a disciplinary transfer consisting of 181 SWDs (20.8%) and 687 (79.2%) general education students
- The risk of a disciplinary transfer for general education students is 1.7%, with a risk ratio of 1.40 not signaling disproportionality
- The risk of a disciplinary transfer for SWDs is 2.4%, with a risk ratio of 1.40 not signaling disproportionality

General and Special Education Disciplinary Transfers (T165)

- Enrollment data identified 66 students having a disciplinary transfer code of T165 for total of 69 transfers due to 3 students having 2 disciplinary transfers during 24-25 school year
- Total of 9 SWDs and 57 general education students received a disciplinary transfer
- Black students represented 31 or 47.0% of disciplinary transfers, consisting of 6 SWDs and 25 general education students
- Hispanic students represented 23 or 34.8% of disciplinary transfers consisting of 2 SWDs and 21 general education students
- Other race categories experienced 10 (15.2%) disciplinary transfers consisting of 1 SWD and 9 general education students
- 3.0% of White general education students (n=2) received a disciplinary transfer
- Of the 69 disciplinary transfer events only 31 had evidence of a behavior review request form

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Transfer to Alternative School or Program (referred or voluntary) - In District (T167)

- 801 students experienced a voluntary or involuntary referral to an alternative school or program for a total of 808 events, indicating 7 students were reportedly transferred twice
- A total of 171 SWDs and 630 general education students were transferred
- Black students represent 210 or 26.1% of students who received a voluntary or involuntary transfer consisting of 67 SWDs and 143 general education students
- Hispanic students represent 317 or 29.6% of students who received a voluntary or involuntary transfer consisting of 57 SWDs and 260 general education students
- Other race categories represent 129 or 16.1% of students who received a voluntary or involuntary transfer consisting of 20 SWDs and 109 general education students
- White students represent 145 or 18.1% of students who received a voluntary or involuntary transfer consisting of 27 SWDs and 118 general education students
- Of the 808 transfers, 22 had a behavior review request form submitted

Data-Based Outcomes and Action Plan Requirements

The following outcomes are intended to significantly reduce both the total number and the disproportionate rate of out-of-school (OSS) and in-school (ISS) disciplinary removals for students with disabilities (SWDs) and Black SWDs. These proposed outcomes focus on lowering the risk for each student group—specifically SWDs and Black SWDs—to better align with the state’s average suspension rate of 2.9%.

The overarching objective is to ensure that disciplinary referral and removal rates for SWDs and Black SWDs are comparable to those of general education students, as well as to the rates observed in other districts across the state. This comparison is rooted in the expectation that, when schools appropriately identify and address behaviors related to disabilities through effective interventions and supports, students with disabilities should not experience higher rates of disciplinary removals than their nondisabled peers. Instead of punitive measures, the focus should be on implementing supportive strategies that directly address the underlying behavioral and mental health needs associated with a student's disability.

Outcome #1: Reduction in Disciplinary Removals—Combined Suspensions for SWDs

By September 30, 2031, the District will reduce the combined (OSS and ISS) suspension rate for SWDs to match the state average of 2.9% or lower.

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Outcome #2: Reduction in Disciplinary Removals—Combined Suspensions for Black SWDs

By September 30, 2031, the District will reduce the combined (OSS and ISS) suspension rate for Black SWDs to 2.0% or lower.

Outcome #3: Reduction in Long-term Disciplinary Removals—10 or more days for SWDs

By September 30, 2031, the District will reduce the long-term suspension rate for SWDs to a level comparable to their nondisabled peers, to 0.4% or lower.

Outcome #4: Reduction in Long-term Disciplinary Removals—10 or more days for Black SWDs

By September 30, 2031, the District will reduce the long-term suspension rate for Black SWDs to 0.2% or lower.

Outcome #5: Increase in Behavioral and Mental Health Supports, Services, and Assessments for SWDs Subjected to Disciplinary Removals

By September 30, 2031, the District will convene an IEP meeting for 95% of all students with disabilities who experience two or more out-of-school suspensions (OSS) or in-school suspensions (ISS), or whose cumulative removals reach six or more days. The purpose of these meetings will be to review and potentially enhance behavioral and mental health supports, services, and assessments, including behavior intervention plans (BIPs), counseling services, and functional behavioral assessments (FBAs).

Outcome #6: Accurate Reporting of Disciplinary Removals

By September 30, 2031, the District will ensure that 98% of all out-of-school suspensions (OSS) and in-school suspensions (ISS) are accurately reported in the student information system. This includes maintaining required documentation, such as suspension notice forms and suspension checklists signed by parents or guardians, for all students with disabilities (SWDs) who experience an OSS or ISS.

Outcome #7: Compliance with Suspension Procedures and Checklist

By September 30, 2031, the District will demonstrate 95% compliance with the elements of the suspension checklist.

Outcome #8: Reduction in Expulsions and Disciplinary Transfers of SWDs and Black SWDs

By September 30, 2031, the District will reduce rates of expulsions and disciplinary transfers of SWDs and Black SWDs to less than 1.0%.

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The Action Plan items outlined below are required components of the district's Implementation Plan. These measures are designed to strengthen systemic capacity by prioritizing enhancements in training, data collection, maintenance, reporting, and accountability within the school discipline program. Additionally, the district must build its capacity to foster a cultural shift toward addressing behavioral challenges through support for the behavioral and mental health needs of students with disabilities (SWDs), including Black SWDs, rather than through punitive responses.

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Section 1A. Removals of SWDs, Including Out-of-School Suspension (OSS) and In-School Suspension (ISS), Expulsions and Disciplinary Transfers, and Manifestation Determination Reviews (MDR)		
Required Actions	Goal(s)	Directives
1A.1 Develop a comprehensive discipline procedural manual incorporating a behavior discipline matrix to support administrative decision-making regarding discipline referrals. The manual should clearly delineate procedures employing a progressive discipline model, ensuring consideration of individual student factors, including behavioral and mental health needs as well as disability-related issues. The manual shall define behaviors and misconduct that constitute appropriate discipline referrals to school administrators, as well as differentiate between misconduct and behaviors that are more appropriately mental health referrals. The manual shall instruct administrators to prioritize and exhaust all available other means of corrections (OMCs) before considering in-school suspension (ISS) or out-of-school suspension (OSS). This practice is particularly relevant for minor infractions, including both first-time and repeated minor offenses, when appropriate. Selected interventions should be directly connected to the nature of the offense. For instance, students involved in vaping violations should participate in tobacco and drug education curricula. By ensuring that interventions are specific and relevant to each offense, the manual fosters supportive, effective responses and reduces reliance on punitive measures. The behavior discipline matrix shall outline appropriate responses to misconduct, emphasizing the use of OMCs, and the application of ISS and OSS in a progressive manner. It should aim to minimize or prohibit the use of suspensions for minor infractions such as habitual profanity or vulgarity, tobacco use/vaping, and/or defiance.	Substantially reduce exclusionary removals of SWDs and Black SWDs, as well as law enforcement referrals; substantially increase the use of nonpunitive interventions (OMCs) rather than punitive measures and promote equitable application of interventions and discipline. Develop systemic capacity and establish best practices to substantially reduce removals of SWDs. Ensure policies and procedures reflect and guide best practices and are aligned to state and federal laws and regulations. Implement accountability mechanisms for school administrators who inappropriately and/or demonstrate high rate or disproportionate use OSS and ISS removals.	1, 2, 21

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The behavior discipline matrix shall specify the recommended number of days a student may be removed from school through out-of-school suspension (OSS) or in-school suspension (ISS). This guidance is presented in a clear and progressive format, designed to reduce subjective decision-making and ensure equitable application of disciplinary measures. The recommended duration for student removals ranges from 0 to 5 days. It should acknowledge that applying exclusionary removals is not appropriate when responding to disability-related behaviors and that appropriate responses by schools are to review a student's IEP, specifically the behavioral and mental health support, including the frequency and duration, and convene IEP meetings when appropriate. The manual shall prohibit the involvement of law enforcement and Safety Officer in school discipline that can be effectively carried out by administrators, support staff and teachers. The manual shall guide administrators to carry out the following functions when a suspension is issued: a review of previous nonpunitive interventions attempted prior to the removal; hold a pre-suspension conference with the students and appropriate staff; notification requirements to case carriers; identification and timely provision of IEP or 504 Plan supports and services; notification to parents; data collection and entry requirements, including checklist and suspension notice forms; and a tracking mechanism to monitor progress toward outcomes.		
1A.2 Develop a standardized in-school discipline and intervention program that explicitly delineates the roles and operations of the behavior intervention room, student support centers, in-school suspensions, and non-punitive interventions as defined alternatives to suspension. The ISS program should be implemented uniformly across all campuses, employing consistent terminology and data codes for accurate documentation and referencing of in-school removals.	Substantially reduce exclusionary removals of SWDs and Black SWDs, as well as law enforcement referrals; substantially increase the use of nonpunitive interventions (OMCs) rather than punitive	1, 2, 21

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ISS must be defined as: <i>A disciplinary measure involving the temporary reassignment of a student to a designated classroom, for a minimum of half a school day. This action removes the student from their usual classes, separates them from their peers and standard educational setting, and results in a loss of direct instructional time, beginning with their arrival at school. Additionally, this placement leads to segregation from peers during lunch and recess.</i> The in-school discipline and intervention program shall incorporate procedures for identifying students with disabilities (IEP and 504 Plan) referred for removal; conducting a review of prior nonpunitive interventions implemented before removal; establishing notification protocols for case carriers; ensuring the prompt identification and delivery of IEP or 504 Plan supports and services; providing timely notifications to parents; detailing requirements for data collection and entry; and implementing a systematic tracking mechanism to monitor progress toward defined outcomes.	measures and promote equitable application of interventions and discipline. Develop systemic capacity and establish best practices to substantially reduce removals of SWDs. Establish a reliable data system that documents, stores, and tracks data, with the capacity to disaggregate data by race/ethnicity and disability. Implement accountability mechanisms for school administrators who inappropriately and/or disproportionately use OSS and ISS removals.	
1A.3 Develop and update policies and procedures to provide clear direction for school administrators and officials regarding the issuance of OSS and ISS removals (See Appendix A). These policies should offer comprehensive guidance that prioritizes the use of nonpunitive interventions or alternatives to OSS and ISS for minor infractions and disability-related behaviors. This process entails the development of a suspension checklist that obligates school administrators to: accurately complete the suspension notice form; promptly notify parents or guardians of any out-of-school (OSS) or in-school suspension (ISS), as applicable; convene a	Develop systemic capacity and establish best practices to substantially reduce removals of SWDs. Ensure policies and procedures reflect and guide best practices and are aligned to state and federal laws and regulations.	1, 2, 21

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suspension conference to consider and implement other means of corrections (OMCs) where appropriate; review previous interventions, OMCs, and suspensions, including the cumulative days removed and prior MDRs held in the current school (if applicable); document any concerns or disagreements expressed by parents or guardians; identify students with disabilities (SWDs) who have Individualized Education Programs (IEPs) or 504 Plans; review the student's IEP or 504 Plan, including existing behavioral supports such as Behavior Intervention Plans [BIPs]) and mental health services (such as counseling); evaluate the need for additional behavioral and mental health services or assessments as alternatives to suspension; and inform parents or guardians of their rights to appeal and due process. Additionally, the checklist must include the signature(s) of the parent or guardian. Develop a statement or script that communicates the following information to parents: the District's ongoing initiatives to minimize removals of SWDs and Black SWDs as outlined in the Action Plan and Settlement Agreement; parents' rights to disagree with and appeal any removal decisions; acknowledgment that other means of corrections (OMCs) were reviewed and/or implemented prior to recommending suspension; and an assurance that considerations related to the student's disability, including a review of supports and services detailed in the IEP addressing disability-related behaviors and/or mental health needs, were made. Policies and procedures should incorporate accountability provisions for school administrators who fail to comply with the checklist requirements or who authorize removals that are not aligned with District policy.	Establish practices that substantially increase behavioral supports, services, and assessments offered to SWDs to address disability-related behaviors. Implement mechanisms to notify parents/guardians in a timely manner of disciplinary removals. Establish a reliable data system that documents, stores, and tracks data, with the capacity to disaggregate data by race/ethnicity and disability. Implement accountability mechanisms for school administrators who inappropriately and/or disproportionately use removals on SWDs, and Black SWDs.	
1A.4 Develop comprehensive policies and procedures to ensure accurate data collection for OSS and ISS removals (See Appendix A). All collected information, including relevant forms, must record demographic details such as race/ethnicity, age, grade, and disability status, along with documentation of parental notification efforts and methods. Procedures	Establish a reliable data system that documents, stores, and tracks data, with the capacity to disaggregate data by race/ethnicity and disability.	21

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should provide detailed step-by-step instructions for entering and maintaining data within the student information system. Schools are required to collect and retain hard copies of suspension notice forms and checklists, which must be accessible to district or OIM staff by the third day of each month. Principals must receive monthly reports regarding OSS and ISS removals no later than the 10th day of each month.	Implement accountability mechanisms for school administrators who inappropriately and/or disproportionately use removals on SWDs.	
1A.5 Develop comprehensive guidelines for schools to fulfill the requirement of convening an Individualized Education Program (IEP) meeting for students who have experienced two or more removals, or six or more days of removals, including out-of-school suspension (OSS) and/or in-school suspension (ISS). These meetings should specifically address the student's behavioral challenges or incidents, review existing supports and services, and evaluate the need for additional or enhanced behavioral interventions (BIPs), mental health supports such as counseling, expanded services (including adjustments to frequency and duration), and assessments like functional behavior assessments (FBA). IEP teams are required to thoroughly document all considerations and provide clear justifications when deciding not to offer behavioral or mental health supports, services, or assessments.	Ensure policies and procedures reflect and guide best practices and are aligned to state and federal laws and regulations. Establish practices that substantially increase behavioral supports, services, and assessments offered to SWDs to address disability-related behaviors.	1, 2, 10, 11
1A.6 Design a comprehensive training program and schedule for school administrators and other pertinent SCUSD personnel to facilitate the implementation of the Action Plan requirements aimed at reducing OSS and ISS removals. The training will cover topics such as understanding disability and related behaviors, components of the checklist, alternatives to suspension, data entry, maintenance and reporting procedures,	Develop systemic capacity and establish best practices to substantially reduce removals of SWDs.	1, 2, 17, 21

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distinguishing between education and penal code violations, as well as implicit and explicit bias.		
1A.7 Revise policies, procedures, and training to ensure that schools conduct Manifestation Determination Reviews (MDRs) with the objective of safeguarding students from discriminatory practices and adhering to established best practices (See Appendix A). Create a checklist that guides schools in the thorough review of all relevant students IEPs and student records (not limited to a specific timeframe), review the number of prior removals and cumulative days removed to identify previous interventions and behavioral patterns, considerations of any recent changes to the student's health, mental health or new areas of suspected disability, reviews information from multiple teachers and/or service providers (if applicable), assess whether the supports, services and placement were appropriate and reasonably calculated, and requires all team members to provide input in the determination of whether the misconduct was a manifestation of the student's disability, or failure to implement the IEP. Develop a letter and script for families outlining the purpose and intent of an MDR. The communication should explain that the team will assess whether the student's misconduct was substantially related to their disability and address potential consequences if such a relationship is established. It should inform families of their rights, including the ability to determine the composition of the IEP team (such as inviting an advocate, medical or mental health professional, or individuals knowledgeable about the student), the right to submit new or additional information pertaining to their child's disability for consideration, clarification that determinations are made collectively by the team rather than by any single individual, and the right to disagree with the outcome and seek due process.	Ensure policies and procedures reflect and guide best practices and are aligned to state and federal laws and regulations. Develop systemic capacity and establish best practices to substantially reduce removals of SWDs. Establish a reliable data system that documents, stores, and tracks data, with the capacity to disaggregate data by race/ethnicity and disability. Implement accountability mechanisms for schools and administrators who inappropriately and/or disproportionately use removals on SWDs.	1, 2, 10, 21

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Establish a tracking system designed to record, at minimum, the following: MDRs conducted, number of days suspended at the time of MDR, determinations rendered, previous corrective actions taken by other means of corrections (OMCs), outcomes of meetings (such as service additions, new assessments, or changes in placement), and any parent disagreements.		
1A.8 Review, revise or create policies and procedures for behavior hearings, expulsion and disciplinary transfers, including voluntary and involuntary discipline transfers, to comply with education code requirements (See Appendix A). Effective policies should incorporate robust data tracking and oversight mechanisms to promote transparency, fairness, and nondiscrimination. This process involves creating a mechanism to track behavior hearings and their outcomes, as well as student demographics such as age/grade, gender, race/ethnicity, and disability status. The tracker must be updated by the third day of each month and should be accessible to both district and OIM staff.	Ensure policies and procedures reflect and guide best practices and are aligned to state and federal laws and regulations. Develop systemic capacity and establish best practices to substantially reduce removals of SWDs. Establish a reliable data system that documents, stores, and tracks data, with the capacity to disaggregate data by race/ethnicity and disability.	TBD
1A.9 Prepare monthly and yearly reports that provide detailed information on disciplinary actions including Out-of-School Suspension (OSS), In-School Suspension (ISS), expulsions, and voluntary and involuntary disciplinary transfers. All data must be broken down at least by race/ethnicity, age or grade level, gender, and disability status. School principals and central office staff are required to examine these OSS, ISS, expulsion, and disciplinary transfer reports every month. This regular review helps maintain ongoing oversight and accountability for discipline procedures involving students with disabilities (SWDs) and	Establish a reliable data system that documents, stores, and tracks data, with the capacity to disaggregate data by race/ethnicity and disability. Implement accountability mechanisms for schools and administrators who inappropriately and/or	1, 2, 21

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Black SWDs. If schools are identified as having elevated or disproportionate disciplinary removal rates for SWDs or Black SWDs, corrective actions must be taken. These actions can include targeted interventions and extra staff training as needed.	disproportionately use removals on SWDs.	
1A.10 Comprehensive Safety Plans must incorporate both districtwide and site-specific procedures pertaining to the discipline program, with particular emphasis on Positive Behavior Interventions and Support strategies and programs designed to address, reduce, and prevent disciplinary referrals. Comprehensive Safety Plans should be available to staff, parents, and the community, at minimum, on every school campus and through each school's website.	Develop systemic capacity and establish best practices to substantially reduce removals of SWDs. Implement accountability mechanisms for schools and administrators who inappropriately and/or disproportionately use removals on SWDs.	1, 2, 20

Section 1B. Referrals of SWDs to Law Enforcement and Campus Safety and Supervision Personnel

The second part of this section evaluates referrals of SWDs and Black SWDs to law enforcement and campus safety and supervision personnel, assessing whether these student groups are subject to disproportionate overrepresentation. The findings, outcomes, and requirements for integration into the district's Implementation Plan are also addressed.

Currently, the district does not maintain systematic, centralized data on student referrals to campus safety and supervision personnel, and Safety Officers. As a result, performance baselines and corresponding outcomes could not be established. However, Action Plan requirements are provided to support reorganization of the campus safety and supervision program that requires the district to collect referral data during the 2026–27 school year to determine whether a data-based outcome is warranted for the compliance period.

In 2019, the district made a significant shift in its approach to student safety by moving away from the traditional School Resource Officer program. Instead, the district adopted a new model that prioritizes prevention, intervention, and student support. This change marked the creation of the Safe Schools office, which established a comprehensive safety strategy centered on addressing student needs holistically.

The Safe Schools office promotes a philosophy that places mental health, emotional support, conflict resolution, de-escalation, and restorative justice at the forefront of its safety practices. Rather than relying on conventional disciplinary measures, such as referrals to law enforcement, the office emphasizes proactive and supportive interventions. The focus is on resolving issues through restorative practices and providing students with resources to support their well-being, aiming to foster a safer and more inclusive school environment.

The Safe Schools program is organized into five brackets, each linked to a major high school and its feeder schools. Each bracket has a Safety Officer and two Lead Campus Supervisors who handle safety and intervention. Safety Officers manage operations, assess threats, and deter incidents, responding to crises like parent disputes, large student altercations, and threats. They are based at high schools and serve as law enforcement liaisons.

Lead Campus Supervisors are part of the Prevention and Intervention team, overseeing students from the "Golden List" identified by Safe Schools using discipline data. They provide tiered interventions such as check-ins, mentoring, goal setting, restorative circles, conflict mediation, and SEL skill development. Students can also be referred through a formal process with a referral form. Besides supporting students directly, Lead Campus Supervisors attend Coordination of Services Team (COST) meetings and connect families with school and community resources.

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A recently added Security Services unit patrols the campuses in the evenings and on weekends. As part of the facilities team, they have limited student contact and do not handle school crises.

While the Safe Schools program lacks a formal board policy, it follows established procedures to handle crises consistently. These include a service flow chart and School Administrative Guidance, which help staff respond effectively during emergencies. The Service Flow Chart provides clear steps for staff dealing with student crises, covering identification, categorization, emergency levels, eligibility review, support, and intervention monitoring. This organized method ensures students get timely and appropriate help based on each situation's urgency and type.

The "School Administrator Guidance" provides clear instructions on whom to contact in different crisis situations, outlining when to involve the Safety Intervention and Response Coordination (SIRC) team, local police for non-emergencies, or 911 for emergencies. The guidance instructs administrators to contact the SIRC team for immediate nonviolent de-escalation or consultation about involving law enforcement. Law enforcement should only be called if there's a mandatory school notification, such as imminent danger to health or safety, regardless of parental requests. The document also lists contact information for CPS and the Mental Health/Crisis Team, and outlines steps for responding to on-campus mental health crises.

The Safe Schools Department uses two tracking systems to monitor its work. The first is a call log filled out by Safety Officers, documenting their site activities and any law enforcement contact. The Daily Log of Services, kept by Lead Campus Supervisors, records their case management activities, intervention delivery, disciplinary involvement (such as helping in the discipline office or supervising detention), and participation in student searches. While both tracking systems note law enforcement contacts and disciplinary actions, some records only indicate staff participation without specifying which students were involved.

The Safe Schools program review found the staff's commitment to at-risk students and robust data tracking as strengths. Data use supports informed decisions, resource allocation, and enhances collaboration among schools, families, and law enforcement to foster a safer educational environment.

Despite these positive aspects, the review found that there is a need for the development of clear policies and procedures. Establishing such guidelines would help ensure that implementation is consistent and equitable across all schools. Additionally, the review identified opportunities to enhance both the scope and the reliability of support provided to schools, making sure that resources and interventions are delivered in a uniform manner and reach all students who need them.

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The Safe Schools program faces a significant challenge in providing comprehensive support and coverage across all campuses. Due to limited resources, Safe Schools staff cannot be present at every school, resulting in gaps in direct supervision and assistance.

To address these gaps, individual schools hire and maintain their own campus safety and supervision staff. These staff members often deliver similar or even identical support and services as those provided by Safe Schools personnel. However, the roles, reporting structures, and training requirements for campus safety staff vary from school to school, leading to inconsistencies in how safety and supervision protocols are carried out.

Additionally, the approaches and practices implemented by campus safety staff differ across schools. This variation means that the effectiveness and consistency of safety measures depend largely on each school's procedures, staff training, and interpretation of protocols, which may result in uneven experiences for students and staff district-wide.

The district does not have a unified or cohesive safety and supervision program. Despite the Safe Schools staff demonstrating a strong commitment to the program's objectives and the services they offer, there is a distinct separation between the roles and responsibilities assigned to ensure campus supervision and student safety. This division contributes to varied approaches across different schools.

Collaboration between Safe Schools staff and individual site safety personnel varies from one school to another. In some cases, schools report a more cooperative working relationship, but such collaboration is not standardized district-wide and largely depends on each school.

A review of law enforcement data revealed a concerning trend: Students with Disabilities (SWDs) and Black students—including both those with and without disabilities—are significantly overrepresented and disproportionately affected in law enforcement referrals. This disproportionality is especially troubling due to its far-reaching consequences. Law enforcement referrals can contribute to the perpetuation of the school-to-prison pipeline, a phenomenon where disciplinary actions in schools increase the likelihood of subsequent involvement in the criminal justice system.

Furthermore, these findings highlight the lack of adequate training and understanding among staff regarding the impact of disability on student behavior. Without this knowledge, interventions may not be appropriately tailored, resulting in inequitable treatment and outcomes for affected students. Addressing these issues is critical to ensuring that school safety and disciplinary practices do not inadvertently reinforce systemic inequities.

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One of the major concerns highlighted in the review is the limited completeness of law enforcement referral data within the student information system (SIS). Less than 10% of referral events are documented in the SIS, while the majority of incidents are maintained in the Safe Schools dataset. This discrepancy results from a lack of clear policies and procedures, inconsistent reporting practices among site administrators, and insufficient oversight from central office supervisors.

The lack of comprehensive and consistent data recording hinders the district's ability to effectively identify potentially inappropriate referrals. Additionally, it limits the capacity to assess whether law enforcement referrals disproportionately affect Students with Disabilities (SWDs) and Black students, including those with and without disabilities. Without accurate and complete data, efforts to evaluate and address inequities in referral practices are significantly impeded.

The Action Plan includes initiatives designed to strengthen a consistent and integrated safety program, including establishing a comprehensive framework that promotes compliance with standardized policies, procedures, and practices across all schools. By focusing on consistency and integration, the district can eliminate variations in safety approaches and ensure that every school adheres to the same standards. The comprehensive framework supports the implementation of uniform safety measures, standard and mandatory training, encourages cooperation among staff, and facilitates accurate reporting practices. Ultimately, these efforts contribute to a safer and more equitable environment for all students and staff throughout the district. A key aspect of the Action Plan is the emphasis on considering disability-related behaviors during the referral process. Schools are required not only to take these factors into account but also to thoroughly document and justify the reasons for any law enforcement referrals made. This approach ensures greater accountability and transparency, supporting equitable disciplinary practices throughout the district.

The Action Plan also mandates the implementation of equitable, well-trained responses to safety incidents, along with enhanced procedures to ensure that students with disabilities receive all accommodations and supports outlined in their Individualized Education Programs (IEPs) during such situations. Additionally, the plan introduces data governance enhancements aimed at standardizing reporting practices, strengthening administrative oversight at both the school and central office levels, and promoting the effective use of data for monitoring and evaluating the safety and supervision program.

Baseline Performance

An analysis of law enforcement data from the 2024–25 academic year highlights a concerning pattern of disproportionality. Students with Disabilities (SWDs) were found to be significantly overrepresented in law enforcement referrals. Notably, Black SWDs experienced pronounced disproportionality in these referrals.

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Baseline performance metrics were employed to guide the formulation of targeted, data-driven outcomes and requirements of this Action Plan. The baseline performance measures are detailed below and serve as the basis for guiding the district's Implementation Plan efforts to address and reduce disproportionality in law enforcement referrals.

Law Enforcement Referrals

Overall Baselines

- Of all referrals made to law enforcement, just 10 cases (7.5%) were documented in the student information system (SIS), while most incidents (123, or 92.5%) appeared only in Safe Schools program datasets. This suggests that the SIS—which is used for state and federal reporting—significantly underreports such incidents
- In total, 117 students were referred to law enforcement, accounting for 132 distinct referral events

General Education Baselines

- General education students made up 70.0% (n = 82) of referrals and 68.9% (n = 91) of referral events
- The risk of law enforcement referral among general education students is 0.2%
- The risk of law enforcement referrals for Black general education students is 0.7%.
- A risk ratio of 3.49 shows that Black students are about three and a half times more likely to be referred than non-Black peers in general education, indicative of significant disproportionality

Special Education Baselines

- Special education students made up 29.9% (n=35) of law enforcement referrals and 31.1% (n=41) of events
- The likelihood or risk of students with disabilities being referred to law enforcement is 0.4%
- SWDs had a risk ratio of 1.85, consistent with being at-risk for disproportionate overrepresentation
- The referral risk for Black SWDs is 1.4%
- Their risk ratio of 6.01 indicates significant disproportionality; Black students with disabilities are six times more likely to be referred to law enforcement compared to their non-Black peers with disabilities
- Referral rates for other student groups were considerably lower: White students accounted for 0.1%, Other for 0.2%, and Hispanic students for 0.3%.

Data-Based Outcomes and Action Plan Requirements

The data-based outcomes are specifically designed to address and reduce the number of law enforcement referrals involving Students with Disabilities (SWDs) and Black students, regardless of disability status. By focusing on these groups, the plan aims

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to mitigate disproportionate impacts and ensure fair treatment across the district. In addition, an outcome to improve the accuracy of referral data by establishing clear data-driven outcomes and implementation requirements, is included.

The goal is to reduce both the overall number and the disproportionate rate of law enforcement referrals for SWDs and Black SWDs, aiming to align their referral rates with those of general education students and Hispanic SWDs. Hispanic SWDs were chosen as the comparison group due to their large enrollment and similar risk levels to nondisabled students.

The District lacks a comprehensive system to track referrals involving campus safety and supervision staff. While campus safety is mostly managed centrally by Safe Schools, some personnel are hired directly by sites. Current incident and intervention records kept by Safe Schools administrators are limited and insufficient for setting baselines or supporting data-driven outcomes.

Outcome #9: Reduction in Law Enforcement Referrals—SWDs and Black SWDs

By September 30, 2031, the District will reduce the rate of law enforcement referrals for students with disabilities (SWDs) and Black SWDs to 0.2% or below.

Outcome #10: Accurate Reporting of Law Enforcement Referrals

By September 30, 2031, the District will ensure that 98% of all law enforcement referrals and outcomes—including searches, restraints, and removals—are accurately reported within the student information system.

The District's Implementation Plan will include the following required initiatives. These measures aim to enhance the district's overall capacity by prioritizing comprehensive training, efficient data collection, management, and reporting, as well as rigorous accountability protocols. This approach ensures adherence to proper administrative practices within the district's policing and campus safety and supervision program.

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Section 1B. Referrals of SWDs to Law Enforcement and Campus Safety and Supervision Personnel		
Required Actions	Goal(s)	Directives
1B.1 Conduct a thorough evaluation and revision of the organizational structure for the campus safety and supervision program. This process should include the creation of a comprehensive framework that clearly defines the roles and responsibilities of campus safety and supervision personnel, with an emphasis on prioritizing safety and supervision while minimizing or excluding their participation in disciplinary actions. The reorganization aims to implement a cohesive, districtwide program for school safety and supervision. This initiative will be supported by standardized policies and procedures, consistent data collection methods, comprehensive training protocols, and a well-defined accountability framework. Efforts should be directed toward maintaining or reducing operational expenses, with additional staffing considered only when essential. School principals are expected to exercise or share direct authority over campus safety and supervision personnel assigned to their facilities, and to actively participate in collaborative performance evaluations. The program should establish a structured support system at each school, allowing leads or senior campus safety and supervision staff to perform their duties efficiently. This framework will facilitate effective supervision of the program and offer guidance to new employees and other members of the campus safety and supervision team. The school safety program should be designed to implement best practices, such as providing personnel with training through the School Security Officer course offered by the National Association of School Resource Officers (NASRO).	Establish best practices to substantially reduce removals and restraints of SWDs and referrals to law enforcement and campus safety personnel. Ensure policies, procedures, and practices reflect best practices and are aligned to state and federal laws and regulations. Establish a reliable data system that documents, stores, and tracks data, with the capacity to disaggregate data by race/ethnicity and disability. Implement accountability mechanisms for schools that inappropriately and/or disproportionately refer SWDs to campus safety personnel and law enforcement officers.	1, 2, 17

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1B.2 Develop a <i>School Safety Officer and Campus Supervisor Handbook</i> to align with the reorganization and Action Plan. The handbook should prioritize the role of supporting students and the school community within a positive framework that focuses on safety and supervision rather than discipline. The handbook should provide, at a minimum, clear guidance on differentiating between student misconduct addressed by educational or disciplinary policies and actions that fall under criminal or penal codes. It should also outline strategies for interacting with students with disabilities, including effective de-escalation techniques, and offer an overview of behaviors commonly associated with disabilities. Additionally, the handbook must review relevant special education laws pertaining to behavioral and mental health accommodations and detail procedures for implementing behavioral supports and accommodations specified in students' Individualized Education Programs (IEPs).	Establish best practices to substantially reduce removals and restraints of SWDs and referrals to law enforcement and campus safety personnel. Ensure policies, procedures, and practices reflect best practices and are aligned to state and federal laws and regulations. Implement accountability mechanisms for schools that inappropriately and/or disproportionately refer SWDs to campus safety personnel and law enforcement officers.	1, 2
1B.3 Policies and procedures should be developed or updated to reflect the newly defined roles and responsibilities of campus safety and supervision personnel (See Appendix A). These revisions must explicitly address any restrictions or prohibitions related to the involvement of campus safety and supervision staff in school discipline matters. The updated policies will ensure clarity regarding the scope of responsibilities and establish guidelines that align with the comprehensive framework for campus safety and supervision. These policies must define procedures for notifying campus safety and supervision staff, Safety Officers, and law enforcement personnel about students with disabilities who require accommodations or have behavior intervention plans. Administrators and campus safety and supervision staff	Establish best practices to substantially reduce removals and restraints of SWDs and referrals to law enforcement and campus safety personnel. Ensure policies, procedures, and practices reflect best practices and are aligned to state and federal laws and regulations.	1, 2, 17

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should receive training on the statutory requirements related to law enforcement referrals under Education Code Section 48902(e) and Section 1415(k)(6). Furthermore, it is essential to establish accountability measures to ensure that campus safety and supervision personnel comply with District policies pertaining to their assigned roles and responsibilities.	Implement accountability mechanisms for schools that inappropriately and/or disproportionately refer SWDs to campus safety personnel and law enforcement officers.	
1B.4 Establish detailed policies and procedures to guide school administrators and officials in determining when referrals to law enforcement are warranted (See Appendix A). These policies should incorporate the following definition of referral to law enforcement and campus safety and supervision personnel: <i>Is an action by which a student is reported to any law enforcement agency or Campus Safety Officers, for an incident that occurs on school grounds, during school-related events, or while taking school transportation, regardless of whether official action is taken. Citations, tickets, court referrals, and school-related arrests are considered referrals to law enforcement.</i> These guidelines must delineate alternatives to referrals and ensure compliance with EC Section 48902(e) and Section 1415(k)(6) of the IDEA. In accordance with these provisions, when reporting criminal acts involving students with disabilities (SWD), relevant school records are required to be provided to law enforcement agencies for their review. Policies should require that school staff consider a student's disability and related behaviors and possess a thorough understanding of disability-related behaviors, before making referrals to law enforcement. Furthermore, protocols should be implemented to manage situations where referrals to law enforcement pertain to students undergoing mental health crises. These procedures must provide for prompt notification of the	Develop systemic capacity and establish best practices to substantially reduce removals and restraints of SWDs and referrals to law enforcement and campus safety personnel. Ensure policies, procedures, and practices reflect best practices and are aligned to state and federal laws and regulations. Implement accountability mechanisms for schools that inappropriately and/or disproportionately refer SWDs to campus safety personnel and law enforcement officers.	1, 2

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parent or guardian and assess whether voluntary treatment may be authorized by the parent or guardian, consistent with Welfare & Institutions Code Section 5585. Policies and procedures should include clear processes for assessing the appropriateness of each law enforcement referral involving students with disabilities (SWDs), including Black SWDs, to ensure alignment with district guidelines. Reviews are to be conducted by a designated central office administrator. Furthermore, accountability mechanisms must be established for school administrators who submit referrals inconsistent with District policy.		
1B.5 Establish detailed policies and procedures governing the collection and management of data concerning referrals or interactions involving law enforcement and campus safety personnel. This should encompass documentation of all occurrences, including citations, summonses, searches, arrests, restraints, and removals. Data collection should include comprehensive demographic information, such as race/ethnicity, age, grade level, and disability status. Furthermore, all efforts to notify parents or guardians, along with the methods of communication employed, must be thoroughly documented.	Ensure policies, procedures, and practices reflect best practices and are aligned to state and federal laws and regulations. Establish a reliable data system that documents, stores, and tracks data, with the capacity to disaggregate data by race/ethnicity and disability.	21
1B.6 Parents or guardians are required to receive both written and verbal notification on the same day if a student is referred to law enforcement or campus safety and supervision personnel. The notification must specify the grounds for the referral, provide the rationale for contacting law enforcement, and outline any interventions that were attempted before involving law enforcement authorities.	Implement mechanisms to notify parents/guardians in a timely manner of referrals to law enforcement and campus safety personnel.	1, 2

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1B.7 Develop a detailed training program and schedule for campus safety and supervision staff. The plan should incorporate timelines for securing experienced professional trainers and guarantee that all specified training subjects in the Action Plan are thoroughly covered. All existing staff members are expected to complete the required training within six months from the commencement of the 2026-27 academic year. Newly hired personnel must meet this requirement within three months of their start date.	Develop systemic capacity and establish best practices to substantially reduce removals and restraints of SWDs and referrals to law enforcement and campus safety personnel. Establish best practices to substantially reduce removals and restraints of SWDs and referrals to law enforcement and campus safety personnel.	17
1B.8 Implement monthly and annual reporting procedures for all law enforcement interactions, encompassing the issuance of citations and summonses, as well as searches, arrests, restraints, and removals. Reports are to be reviewed on a monthly basis by both school principals and central office personnel. Schools exhibiting elevated rates, overrepresentation, or disproportionate outcomes for students with disabilities (SWDs) and Black SWDs regarding law enforcement referrals or contacts—including citations, summonses, searches, arrests, restraints, and removals—must implement corrective actions. These interventions may include targeted additional training and progressive discipline, as necessary. The District is required to adhere to all relevant state and federal reporting obligations, ensuring the accurate documentation of law enforcement referrals and interactions. Reports must be disaggregated by race/ethnicity, age or grade, gender, and disability status, in full accordance with applicable state and federal regulations.	Ensure policies, procedures, and practices reflect best practices and are aligned to state and federal laws and regulations. Establish a reliable data system that documents, stores, and tracks data, with the capacity to disaggregate data by race/ethnicity and disability. Implement accountability mechanisms for school administrators who inappropriately and/or disproportionately refer SWDs to law enforcement and campus safety personnel.	1, 2, 21

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Section 1C. Restraints and Seclusion; and Provision of Behavioral and Mental Health Supports, Services, and Assessments

The last part of this section analyzes the application of restraints for students with disabilities (SWDs) and evaluates the provision of behavioral and mental health supports, services, and assessments—including counseling, behavior intervention plans (BIPs), and functional behavioral assessments (FBAs)—to SWDs. These interventions are recognized as systematic approaches designed to reduce the utilization of restraints, seclusion, and disciplinary removals by proactively addressing disability-related behaviors and minimizing the likelihood of inappropriate or punitive responses.

Analysis of incident data demonstrates that restraints and seclusion are disproportionately applied to students with disabilities (SWDs). There are notably high rates of both overrepresentation and disproportionality among special education students, with Black SWDs particularly affected. The underlying causes of these disparities are multifaceted.

For general education students, restraints are most commonly implemented in situations involving law enforcement intervention or during physical altercations. In contrast, SWDs—especially those with moderate to severe disabilities—are more likely to experience restraints or seclusion as a response to behaviors related to their disabilities. These might include instances where students become dysregulated or otherwise exhibit disability-related behaviors that are interpreted as requiring intervention. This pattern highlights the need for a careful and equitable approach to managing behaviors in educational settings, ensuring that interventions are not applied more frequently or inappropriately to students with disabilities.

Restraint and seclusion incidents were identified from five distinct data sources, with approximately half of the documented cases accompanied by a Behavior Emergency Report (BER), as mandated by law. Concerns have arisen regarding the inadequate quality of data collection and maintenance at the central level. Additionally, staff demonstrated limited awareness of 30 reported seclusion instances, suggesting that schools may have inaccurately recorded events due to insufficient training and understanding of the legal definitions involved.

Maintaining comprehensive and accurate data is essential for effectively supporting students who have experienced traumatic events, such as restraints, seclusion, or law enforcement interactions. However, the process of gathering reliable information has proven to be difficult due to an evident absence of established structures. This includes gaps in policies, procedures, and oversight by central office administrators, which collectively hinder the ability to ensure data integrity and completeness.

The Action Plan is designed to remedy systemic deficiencies in how restraints are managed for students with disabilities (SWDs). It establishes clear requirements for the collection and maintenance of incident data to ensure accountability and transparency. In

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addition, the plan mandates regular review and investigation of the circumstances surrounding each restraint to evaluate its appropriateness and compliance with legal and ethical standards. As a further safeguard, the Action Plan requires that an Individualized Education Program (IEP) meeting be convened whenever a SWD is subjected to a restraint. This ensures that the educational team examines the incident, assesses the student's needs, and determines any necessary modifications to supports or interventions, thereby promoting student well-being and reducing the likelihood of future restraints.

The evaluation considers how often behavioral and mental health supports are incorporated into IEPs for SWDs. By examining the prevalence of such supports, the analysis highlights the extent to which IEP teams prioritize and address behavioral and mental health needs within individualized plans. Patterns in the inclusion or omission of behavioral and mental health interventions reveal how teams interpret and respond to student needs. This, in turn, may reflect broader systemic practices and inform areas where additional guidance or training may be warranted.

The analysis indicated that approximately 20% of students have an IEP marker identifying behavior that impedes their own learning or the learning of others. This marker is generally associated with targeted supports, including behavior goals, behavior intervention plans (BIPs), and behavior intervention services (BIS), which may involve supervision, consultative services for students with BIPs, and assignment of one-to-one aides. Nevertheless, the review determined that a limited number of students with this indicator actually receive the designated supports and services. Further, inconsistencies were observed; for example, some students with assigned one-to-one aides did not possess the behavior impedes learning indicator or a BIP.

The district currently provides counseling services exclusively through the Educationally Related Mental Health Services (ERMHS) program, which is intended for students who require more intensive and specialized mental health support. This practice differs from established best practices, which advocate for a tiered approach to behavioral and mental health counseling. A tiered model generally includes a spectrum of interventions, ranging from services that address less intensive social-emotional and behavioral needs to ERMHS designated for students necessitating a higher level of care.

According to staff, ERMHS counseling is included in students' IEPs, while short-term counseling and social skills training are offered on an informal basis by other providers such as school psychologists.

An analysis of counseling service recommendations by ERMHS providers indicates that most students with disabilities (SWDs) receive minimal support. The limited provision of services, along with infrequent behavior intervention plans (BIPs) and functional behavior assessments (FBAs), suggests that these students are not receiving adequate behavioral and mental health support and are experiencing elevated rates of disciplinary measures, law enforcement referrals, and physical restraints.

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A comprehensive review of EHRMS prescription minutes indicates significant under-servicing among students. Only 7.3% of students with disabilities (SWDs) receive EHRMS or counseling services, with approximately 42.2% receiving 30 minutes or less per month, and about 23.0% receiving between 30 and 60 minutes monthly. Slightly more than one quarter benefit from services ranging between 61 and 120 minutes per month. These limited service rates are further substantiated by analysis of EHRMS provider caseload minutes; twelve out of fourteen providers have monthly service commitments totaling between 1,600 and 2,000 minutes, averaging 1,895 minutes per month or 1.6 hours of counseling daily. The remaining two providers serve close to 3,000 minutes monthly, averaging 2.5 hours per day. It should be noted that these daily averages are calculated based on individual student sessions and may decrease if group sessions are provided, which is likely for certain students. The data also revealed a wide range of variability in prescription minutes, including several significant outliers. This variation points to a lack of standardized procedures for determining service minutes and underscores the necessity for enhanced oversight in this domain.

The district employs two Board Certified Behavior Analysts (BCBAs) and eleven Behavior Intervention Specialist teachers to support behavioral interventions. Their responsibilities include conducting Functional Behavioral Assessments (FBAs) and Service Coordination for Intensive Assistance (SCIA) assessments, as well as providing supervision and oversight regarding the implementation of Behavioral Intervention Plans (BIPs) and assignment of one-to-one aides. These groups operate under distinct reporting structures and currently do not engage in collaborative practices.

During the 2024–25 school year, district records indicated that only ten Functional Behavior Assessments (FBAs) were documented, with an additional eight assessments identified through the OIM review of Manifestation Determination Reviews (MDRs). The relatively low frequency of reported FBAs raised concerns regarding the accessibility of assessment and behavioral support resources for students, as well as the data collection and management practices employed by administrators to oversee these programs. This concern led to a request for assessment data for the 2025–26 school year, which returned no available information. The district explained that such data are not “centrally maintained in a format that permits prompt extraction or production,” further restricting a comprehensive evaluation of districtwide capacity for providing behavioral assessments.

Central office staff indicated that there was no formalized process for conducting Special Circumstance Instructional Assistant (SCIA) assessments during this period. The absence of a structured mechanism may result in resources being allocated and assigned without a standardized assessment, which is necessary to ensure consistency in identifying and supporting students who require restrictive assistance. This lack of process and oversight may contribute to students being placed in more restrictive environments, with schools defaulting to SDC placements and frequently recommending 1:1 aides as the primary solution. Corroborating this premise, site level staff highlighted the widespread deployment of one-to-one aides, particularly within special day classes. The high prevalence of these aides raises questions regarding the consistency and appropriateness of their assignments and training.

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Concerns were also expressed regarding the district's reliance on non-public agency (NPA) staff. Many NPA staff members were reported to lack adequate training and required supervision from district personnel, including Behavior Intervention Specialists (BIS) and Resource Specialist Program (RSP) teachers, rather than being overseen by their employing agencies. Additionally, the practice of allowing NPA personnel to make service prescription recommendations was identified as problematic. In some cases, these recommendations resulted in unnecessarily high levels of service, further underscoring the need for greater oversight and standardized procedures in the provision and supervision of behavioral supports.

The Action Plan and Outcomes are structured to enhance behavioral and mental health services for students whose Individualized Education Program (IEP) teams identify behaviors that interfere with their learning or the learning of others. This initiative aims to provide increasingly comprehensive levels of support tailored to these students' needs, with core goals focused on decreasing disciplinary actions and reducing dependence on one-to-one aides.

By deploying targeted interventions, the Action Plan promotes a school environment that transitions from punitive measures toward a more informed perspective regarding the impact of disability on behavior. This approach encourages schools to offer suitable and sufficient supports, thereby ensuring students with disabilities receive the necessary interventions to achieve educational success and maintain well-being.

Baseline Performance

Analysis of restraint and seclusion data reveals a pronounced overrepresentation and significant disproportionality among students with disabilities (SWDs) and Black SWDs. The observed disparities between general education and special education students can be attributed to differences in the behaviors that precipitate these interventions. General education students are most often restrained following physical altercations or law enforcement involvement, including the application of mechanical restraints such as handcuffs. Conversely, SWDs may be subject to restraint or seclusion due to behaviors associated with their disabilities. Although this factor contributes to the trend, restraint or seclusion should only be utilized for students with disabilities as a last resort, strictly in situations where immediate danger to self or others is present.

Data from the 2025–26 school year concerning behavioral and mental health supports, services, and functional behavioral assessments (FBAs) indicate that students with disabilities (SWDs) receive these resources at relatively low rates. This trend persists even within eligibility categories where disability-related behaviors may be misconstrued as misconduct. Further analysis of removal records and manifestation determinations associated with Individualized Education Programs (IEPs) reveals a limited provision of supports and assessments for SWDs subjected to exclusionary disciplinary measures, including those facing extended removals.

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The baseline performance provided the essential basis for recommending data-driven outcomes and defining requirements for the Action Plan.

Restraints and Seclusion

General Education Restraint and Seclusion

- 15 general education students (18.8%) were involved in 18 restraint incidents (13.3%), with no seclusions reported
- Restraint risk for general education students is 0.04%
- Black students represented 6.7% of restraint events (1 incident)

Special Education Restraint and Seclusion

- 65 special education students (81.3%) were restrained or secluded, making up 86.7% of all incidents.
- 41 students with disabilities experienced restraints in 87 incidents
- 24 SWDs experienced 30 seclusion events, including one at a non-public school (NPS)
- SWDs face a 0.8% risk of restraint or seclusion
- The risk ratio is 18.8, meaning SWDs are 18.8 times more likely to experience restraint or seclusion than general education students, indicative of significant disproportionality
- Black SWDs made up 40% of special education students restrained or secluded and 37.6% of such events
- Black SWDs' risk is 1.9%
- Black SWDs have a risk ratio of 3.00, indicative of significant disproportionality.

Additional Findings

- Data regarding restraint and seclusion were obtained from five distinct reporting structures and sources, with unique incidents identified in each. This indicates that records of restraint and seclusion events were not consistently maintained across the sources
- Behavior Emergency Report (BER) forms were generated for 71 (52.6%) out of the 135 documented events; however, 17 BERs were excluded due to insufficient information to determine whether physical or mechanical restraint was applied
- No BERs were available for any of the 30 reported seclusion events. With exception of one incident occurring at a non-public school, all seclusion events took place within district schools

Provision of Behavioral and Mental Health Supports, Services, and Assessments

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Provision of BIPs for Students whose Behavior Impedes Learning

- 1,382 SWDs or 20.7% of the entire special education population had an indicator of behavior impedes learning
- 312 SWDs or 8.6% of all special education students had a BIP

Provision of BIPs by Race/Ethnicity

- 150 Black SWDs (13.5%) had a BIP
- 196 Hispanic SWDs (6.6%) had a BIP
- 101 White SWDs (9.0%) had a BIP
- 57 multiracial SWDs (10.0%) had a BIP
- 60 students from other races/ethnicities (7.6%) had a BIP

Provision of BIPs by Eligibility Categories

- 652 or 45.2% of students with Autism had behaviors that impede learning
- 312 or 21.6% of students with Autism had a BIP
- 63 or 53.4% of students with ED had behaviors that impede learning
- 42 or 35.6% of students with ED had a BIP
- 44 or 20.2% of students with ID had behaviors that impede learning
- 22 or 10.1% of students with ID had a BIP
- 270 or 30.4.2% of students with OHI had behaviors that impede learning
- 111 or 21.6% of students with OHI had a BIP
- 227 or 11.0% of students with SLD had behaviors that impede learning
- 43 or 2.1% of students with SLD had a BIP

Provision of Intensive Individual Instruction Services (IIS) or 1:1 aides

- 337 SWDs or 5.0% of special education students had a 1:1 aide (Intensive Individual Instruction) on their IEP
- Of those receiving IIS services, 254 (75.4%) SWDs had an indicator of behavior impedes learning, but only 185 (54.9%) had a BIP

Provision of IIS by Race/Ethnicity

- 57 or 5.1% of Black SWDs receive IIS services
- 118 or 4.0% of Hispanic SWDs receive IIS services
- 78 or 6.9% of White SWDs receive IIS services
- 40 or 7.0% of multiracial SWDs receive IIS services

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- 44 or 4.8% of students from other races/ethnicities receive IIS services

Provision of IIS by Eligibility Category

- 119 or 8.2% of students with Autism receive IIS services
- 16 or 13.6% of students with ED receive IIS services
- 26 or 11.9% of students with ID receive IIS services
- 50 or 5.6% of students with OHI receive IIS services

Provision of Behavior Intervention Services (BIS) by Duration

- A total of 414 or 5.5% of SWDs enrolled receive Behavior Intervention Services (BIS) on their IEP
- 56 or 13.5 % of students with BIS on their IEPs receive 30 minutes or less of service per month (up to 7.5 minutes per week)
- 93 or 22.5% of students with BIS on their IEPs receive between 31 and 60 minutes per month (between 7.5 to 15 minutes per week)
- 75 or 18.1% of students with BIS on their IEPs receive between 61 to 120 minutes of service per month (between 15 and 30 minutes per week).
- 62 or 15.0% of students with BIS on their IEPs receive between 121 to 240 minutes per month (between 30 and 60 minutes per week)
- 39 or 9.4% of students with BIS on their IEPs receive between 241 to 480 minutes per month (between 60 to 120 minutes per week)
- 8 or 1.9% of students with BIS on their IEPs receive between 481 to 720 minutes per month (between 120 to 180 minutes per week)

Provision of Mental Health Services - Individual Counseling (510) by Race/Ethnicity and Eligibility Categories

Individual Counseling by Race/Ethnicity

- 298 SWDs or 4.5% of all special education students who experienced a disciplinary removal receive individual counseling
- 90 Black SWDs (8.1%) receive individual counseling
- 89 Hispanic SWDs (3.1%) receive individual counseling
- 59 White SWDs (5.2%) receive individual counseling
- 38 multiracial SWDs (6.7%) receive individual counseling

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- 44 of “Other” SWDs (4.8%) receive individual counseling

Individual Counseling by Eligibility Categories

- 56 or 3.9% of students with Autism receive individual counseling
- 55 or 47.5% of students with ED receive individual counseling
- 9 or 4.1% of students with ID receive individual counseling
- 91 or 10.3% of students with OHI receive individual counseling
- 64 or 3.1% of students with SLD receive individual counseling
-

Provision of Mental Health Services - Counseling and Guidance (515) by Race/Ethnicity and Eligibility Categories

Counseling and Guidance by Race/Ethnicity

- 221 SWDs or 3.3% of all special education students subjected to a disciplinary removal receive counseling and guidance
- 63 Black SWDs (8.1%) receive counseling and guidance
- 75 Hispanic SWDs (2.5%) receive counseling and guidance
- 44 White SWDs (3.9%) receive counseling and guidance
- 25 multiracial SWDs (4.4%) receive counseling and guidance
- 14 of “Other” SWDs (1.5%) receive counseling and guidance

Counseling and Guidance by Eligibility Categories

- 55 or 3.8% of students with Autism receive counseling and guidance
- 47 or 39.8% of students with ED receive counseling and guidance
- 7 or 3.2% of students with ID receive counseling and guidance
- 63 or 7.1% of students with OHI receive counseling and guidance
- 43 or 2.1% of students with SLD receive counseling and guidance

Provision of Counseling Services (ERMHS) by Duration

- 552 or 7.3% of SWDs receive counseling support on their IEP in the form of Individual Counseling, Counseling and Guidance and Social Work Services
- 233 or 42.2% of students with counseling on their IEPs receive 30 mins or less of counseling per month (up to 7.5 minutes per week)

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- 132 or 23.0% of students with counseling on their IEPs receive between 31 and 60 minutes per month (between 7.5 to 15 minutes per week)
- 146 or 26.5% of students with counseling on their IEPs receive between 61 to 120 minutes per month (between 15 and 30 minutes per week)

Provision of Functional Behavioral Assessments (FBAs)

- A total of 10 students had an FBA during the 2024-25 school year
- The racial/ethnic breakdown is as follows: Hispanic - 4, White -2, Multiracial - 2, Black - 1 and Asian -1
- Nine FBAs were conducted for students already receiving special education services with the remaining assessment completed as part of an initial IEP
- The list of assessments provided did not include any of the eight students who had an FBA as part of an MDR, highlighting a lack of uniform reporting, inaccurate data, and poor administrative oversight

Data-Based Outcomes and Action Plan Requirements

The outcomes are designed to significantly decrease the frequency and disproportionate application of restraints and seclusions among students with disabilities (SWDs), particularly Black SWDs. The aim is to align risk levels for SWDs with those of their nondisabled counterparts, achieving comparable referral rates between general education and special education populations and advancing equity. Ideally, the use of restraints would affect only a small number of students and be employed exclusively as measures of last resort.

One three-part outcome is designed to substantially increase behavioral and mental health supports, including behavior intervention plans (BIPs) and counseling services for SWDs whose behaviors impede their learning. The outcome is separated into three parts to address specific eligibility categories.

Outcome #11: Reduction of Restraints and Seclusions of SWDs and Black SWDs

By September 30, 2031, the District will reduce the rate of restraints and seclusions for SWDs to 0.4% or lower.

Outcome #12: Timely Completion of IEPs for SWDs Subjected to a Restraint

By September 30, 2031, the District will schedule an IEP meeting within two days and hold it within five school days for 95% of all SWDs who are subjected to a restraint, including those carried out by campus safety and supervision personnel

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and law enforcement, to consider increasing or adding behavioral supports, services, and assessments, such as behavior intervention plans (BIPs) and functional behavioral assessments (FBAs).

Outcome #13: Accurate Reporting of Restraints for SWDs

By September 30, 2031, the District will accurately report 98% of all restraints using the behavior emergency report (BER) in the student information system, including maintaining original hard-copy forms signed and dated by parents/guardians and by the principal or designee, for all SWDs who are subjected to a restraint, including those carried out by campus safety personnel and law enforcement officers.

Outcome #14a: IEP Team Consideration of Special Factors—Behavioral Interventions, Strategies, and Supports for Students with Autism

By September 30, 2031, the percentage of students with autism, whose behavior impedes learning, with a behavior support plan or behavior intervention plan will increase to 90%.

Outcome #14b: IEP Team Consideration of Special Factors—Behavioral Interventions, Strategies, and Supports for Students with an Emotional Disability

By September 30, 2031, the percentage of students with an emotional disability, whose behavior impedes learning, with a behavior support plan or behavior intervention plan will increase to 90%.

Outcome #14c: IEP Team Consideration of Special Factors—Behavioral Interventions, Strategies, and Supports for Students with Specific Learning Disabilities and Other Health Impairments

By September 30, 2031, the percentage of students with specific learning disabilities and other health impairments, whose behavior impedes learning, with a behavior support plan or behavior intervention plan will increase to 90%.

The tasks below are intended for integration into the district's Implementation Plan. These goals are designed to increase the district's systemic capacity by advancing training protocols, data acquisition, maintenance, reporting, and accountability measures. The objective is to promote effective administrative practices concerning the application of restraints and to improve the accessibility and delivery of behavioral and mental health supports and services.

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Section 1C. Restraints and Seclusions and Provision of Behavioral and Mental Health Supports and Services		
Required Actions	Goal(s)	Directives
1C.1 Develop or revise policies and procedures to integrate best practices aimed at minimizing and preventing the use of restraints and seclusions (see Appendix A). Updates should emphasize de-escalation strategies and proactive interventions, such as Behavioral Intervention Plans (BIPs), to reduce reliance on restraints. Policies should clearly define and limit the involvement of campus safety personnel in cases of student misconduct, disability-related behaviors, or mental health crises when these situations can be effectively managed by school administrators, mental health professionals, or behavior support staff such as Board-Certified Behavior Analysts (BCBAs). Furthermore, policies that clearly prohibit the practice of seclusion under all circumstances.	Establish systemic capacity and practices that substantially reduce restraints of SWDs and Black SWDs. Ensure policies and procedures reflect and guide best practices and are aligned to state and federal laws and regulations. Implement accountability mechanisms for schools that inappropriately and/or disproportionately use restraints on SWDs and Black SWDs.	1, 2, 13
1C.2 Establish and enforce well-defined policies and procedures for the collection and maintenance of data pertaining to restraints and seclusions (See Appendix A). All collected data, including BER forms, should contain demographic information such as race/ethnicity, age, grade level, and disability status, in addition to detailed and accurate documentation of the restraint type, duration, and parental notification. Compliance with data collection requirements is mandatory whenever any student is restrained, whether physically or mechanically, in accordance with relevant legal definitions. This applies to incidents involving SCUSD personnel, campus safety staff, and law enforcement officers.	Ensure policies and procedures reflect and guide best practices and are aligned to state and federal laws and regulations. Establish a reliable data system that documents, stores, and tracks data, with the capacity to disaggregate	21

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Site principals are accountable for ensuring that documentation of restraints is thorough and accurate. All BERs signed by parents or guardians must be stored in a central location and made readily available for review by district or OIM personnel. Principals are required to receive monthly restraint reports, with data disaggregated by both disability status and race/ethnicity.	data by race/ethnicity and disability. Implement accountability mechanisms for schools that inappropriately and/or disproportionately use restraints on SWDs and Black SWDs.	
1C.3 Develop and implement policies, procedures, and guidelines to ensure that schools adhere to the Action Plan’s mandate to schedule an Individualized Education Program (IEP) within two days and hold an IEP meeting within five school days for students who have experienced restraint. The objective of the IEP meeting is to review the student’s behavior, evaluate existing behavioral and mental health accommodations, supports, and services—including their frequency and duration—and recommend new or improved accommodations, supports, services, or assessments, such as FBAs, to address the student’s behavioral, social-emotional, and mental health needs.	Ensure policies and procedures reflect and guide best practices and are aligned to state and federal laws and regulations. Establish practices that substantially increase behavioral and mental health supports, services, and assessments offered to SWDs and Black to address disability-related behaviors. Implement accountability mechanisms for school administrators who do not schedule or hold IEP meetings within the required timelines.	1, 2, 10, 13

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1C.4 Establish a protocol to evaluate the appropriateness of each incident involving restraint or seclusion. This procedure should include a thorough review of de-escalation techniques utilized, consideration of alternative interventions implemented, evaluation of adherence to established guidelines regarding the application of restraints, prompt notification of parents, and verification of compliance with convening timely IEP meetings as well as documentation of their outcomes. Schools that do not comply with district policies and procedures, improperly or inconsistently utilize restraint or seclusion, or fail to fulfill data collection and reporting requirements should be subject to corrective actions. These may include mandatory staff training and progressive disciplinary measures to ensure adherence to established standards. The review shall be performed by a SELPA administrator or an authorized designee with the requisite training and qualifications.	Establish systemic capacity and practices that substantially reduce restraints of SWDs and Black SWDs. Implement accountability mechanisms for schools and administrators who inappropriately and/or disproportionately use restraints on SWDs and Black SWDs.	1, 2, 13, 20, 21
1C.5 Design a comprehensive training program and schedule for school administrators and relevant staff to support the effective implementation of the Action Plan, with the objective of reducing restraints and enhancing behavioral and mental health supports, services, and assessments. The program will require mandatory CPI training for administrators, campus safety personnel, behavioral 1:1 aides (including those from both district and non-public agencies), special education teachers, and any staff responsible for providing behavioral and mental health support. All designated personnel are expected to complete CPI training within six months of the commencement of the 2026-27 school year. Newly hired staff must complete the training within three months of their start date. All relevant staff must maintain current training certifications in strict adherence to established standards.	Establish systemic capacity and practices that substantially reduce restraints of SWDs and Black SWDs. Establish practices that substantially increase behavioral supports, services, and assessments offered to SWDs and Black SWDs to address disability-related behaviors.	1, 2, 13, 17

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1C.6 Conduct a thorough evaluation of the existing service delivery program for behavioral and mental health supports, services, and assessments. This evaluation should encompass a comprehensive review and revision of policies and procedures, including those pertaining to Least Restrictive Environment (LRE), to ensure that SWDs receive appropriate support within the general education setting to the maximum extent possible. The analysis must examine relevant data and present recommended strategies to significantly and equitably enhance behavioral and mental health supports, including detailed prescriptions for service frequency and duration, as well as assessments such as Functional Behavioral Assessments (FBAs) and SCIAAs.	Establish systemic capacity and practices that substantially reduce restraints of SWDs and Black SWDs. Establish practices that substantially increase behavioral supports, services, and assessments offered to SWDs to address disability-related behaviors.	1, 2, 13, 20
1C.7 Counseling supports provided as designated instructional services on Individualized Education Programs (IEPs) should be reorganized to adhere to the state model. This model distinguishes between IEP counseling services—which address students’ needs related to their IEP goals, such as social skills training, emotional regulation, and behavioral challenges—and Educationally Related Mental Health Services (ERMHS), which are intended for students requiring more intensive, specialized mental health interventions. The restructuring of these services should encompass comprehensive procedural guidelines for the assessment and eligibility criteria associated with each service. Additionally, the revised framework should integrate the expertise of related service providers and mental health professionals in delivering school counseling and ERMHS services, including school psychologists, social workers, and clinically licensed practitioners. These services should be integrated into the MTSS framework, with collaborative structures established to enable effective data sharing and	Establish practices that substantially increase behavioral supports, services, and assessments offered to SWDs to address disability-related behaviors.	1, 2, 11, 15

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communication among providers delivering counseling and mental health services onsite.		
1C.8 Review and update the procedures for conducting FBAs and SCIA's. The assessments should incorporate clear standards ensuring consistent and accurate data collection across various settings. They must address all areas of behavioral challenges during both structured and unstructured activities, facilitate the development of targeted interventions, and mandate regular (daily and weekly) collection of behavioral data. Assessments should also evaluate environmental factors contributing to students' behavioral challenges, such as ineffective instructional programs or classroom management strategies. The results of these assessments should provide recommendations for supports within the general education environment wherever feasible, including the potential use of 1:1 instructional or behavioral aides. For students placed in a special day class, the provision of 1:1 aides must further encompass consideration and delivery of behavioral and mental health services, such as Behavior Intervention Plans (BIPs) and counseling services, including EHRMS. Provide recommendations on appropriate Behavior Intervention Services (BIS) prescriptions, specifying the recommended frequency and duration for both consultative and supervisory supports. Non-public agencies (NPAs) should not conduct FBA and SCIA assessments or make service recommendations unless the district lacks qualified personnel. In such cases, district staff are expected to review and work collaboratively with NPA assessors to ensure recommendations and service prescriptions are appropriate and reasonable.	Ensure policies and procedures reflect and guide best practices and are aligned to state and federal laws and regulations. Establish practices that substantially increase behavioral supports, services, and assessments offered to SWDs to address disability-related behaviors.	1, 2, 3, 4, 5
1C.9 Evaluate the effectiveness of behavioral support staff structures, including Behavior Intervention Support (BIS) teachers and Board-Certified	Establish practices that substantially increase	1, 2, 10, 12, 13

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Behavior Analysts (BCBAs). These services should be organized to provide sufficient support and supervision, facilitating timely completion of Functional Behavioral Assessments (FBAs), Special Circumstances Instructional Assistant (SCIA) assessments, and consistent implementation of behavioral intervention plans (BIPs). The review must provide adequate and equitable coverage for schools and students, while maintaining manageable caseloads that account for anticipated increases in service needs based on this Action Plan and data-driven outcomes. BIS and BCBAs are expected to collaborate within the same department and under unified supervision to ensure consistent, effective service delivery and to minimize duplication of efforts.	behavioral supports, services, and assessments offered to SWDs to address disability-related behaviors.	
1C.10 Conduct a thorough review and revision of school safety plans to ensure full compliance with education code requirements, including EC Section 32282.1. These plans should explicitly outline and emphasize strategies for preventing misconduct, while prioritizing behavioral and mental health supports and interventions.	Establish systemic capacity and practices that substantially reduce restraints of SWDs and Black SWDs.	1, 2, 13
1C.11 Develop informational materials for families, outlining the behavioral and mental health supports, services, and evaluations available to students with disabilities across the district and within each school. It is recommended that these resources be made available in various formats and in the principal languages spoken within the district. Access should encompass the district website, particularly the Special Education Department page, in addition to printed materials such as brochures or mailed correspondence for parents.	Establish practices that substantially increase behavioral supports, services, and assessments offered to SWDs and Black SWDs to address disability-related behaviors.	1, 2, 10, 13

Section 2. Disproportionality in Special Education and Specific Eligibility Categories, of Black students and English Learners

This section examines whether overrepresentation and disproportionality are present among Black students and English learners in both special education overall and specific eligibility categories. The presence of overrepresentation within certain student groups may suggest inappropriate referrals, insufficient or ineffective general education interventions and programs, or vulnerabilities resulting from the subjective nature of some eligibility categories. To address these issues, targeted interventions will be implemented to strengthen the referral and identification process. These interventions will focus on establishing standardized practices that support comprehensive evaluations, emphasizing exclusionary factors such as cultural and linguistic differences.

Enrollment data from the 2024–25 school year indicate elevated rates of special education identification overall. Black, American Indian/Alaskan Native, and Hmong students are found to experience overrepresentation and, in some cases, disproportionate overrepresentation within special education and certain eligibility categories. Although the high identification rates across many student groups moderate risk ratios, the composition index and risk associated with specific groups demonstrate clear and significant overrepresentation.

Black students are overrepresented and/or disproportionately impacted within several special education eligibility categories, including emotional disability (ED), other health impairment (OHI), specific learning disability (SLD), and intellectual disability (ID). These elevated identification rates raise important questions about the effectiveness of culturally responsive pedagogy, the adequacy of general education interventions, and the integrity of referral mechanisms used in the evaluation process.

The persistent overrepresentation of Black students in these categories suggests that current educational practices and interventions may not sufficiently address the cultural, behavioral, or academic needs of these students prior to referral. It also indicates potential shortcomings in the referral and identification process that may be influenced by subjective judgment, rather than objective criteria. As a result, the effectiveness of general education interventions and culturally responsive teaching methods must be re-examined to ensure that they serve as robust first steps before considering special education placement.

The implications of these findings underscore the need for comprehensive evaluations and improved practices in general education settings. Establishing standardized procedures and focusing on exclusionary factors—such as cultural and linguistic differences—are critical steps for ensuring that referrals and identifications are both appropriate and equitable. Addressing these issues will help to strengthen the referral process and promote fair access to supports and services for all student groups.

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School officials have consistently identified behavioral difficulties as a central reason for the elevated rates of special education referrals and identifications. As highlighted in the previous section, Black students are disproportionately affected by disciplinary referrals and removals. These disciplinary actions often serve as a precursor to special education referrals, particularly when changes in placement result in students being assigned to more segregated settings, such as special day classes or separate schools.

This sequence of events demonstrates the significant impact that disciplinary removals can have on student outcomes. Specifically, Black students are frequently denied access to their instructional programs due to these removals, which contributes to the widening of the achievement gap. The resulting special education identification is frequently used as a means to remove students from general education settings and/or to provide supports and services addressing behavioral or mental health needs. School psychologists indicated their exclusion from prereferral teams such as COST and SSTs, which restricts their capacity to provide input regarding the appropriateness of referrals. In the absence of dependable and comprehensive general education supports, students experiencing academic or behavioral challenges are more likely to be referred for special education evaluation.

One notable factor contributing to the increased rates of special education referrals and identifications is the lack of tiered general education supports and interventions, as well as the absence of robust referral processes. Staff members observed disparities among schools, citing instances where students transferring from schools with more comprehensive support systems are referred for special education assessments primarily to secure needed services. Additionally, not all schools are equipped with support centers that provide the necessary infrastructure for delivering interventions and services.

School officials highlighted a prevailing culture that regards special education as the only viable avenue for students to access support and services. This mindset has resulted in frequent referrals to special education, often stemming from the perception that alternative programs in the general education setting are either unavailable or ineffective.

Multiple respondents indicated that inconsistencies and inefficacy within general education instructional programs have led to increased referrals to special education. The opt-in culture further exacerbates these inconsistencies because teachers are not required to follow prescribed curricula or intervention programs, resulting in considerable variability in instructional practices and contributing to the fragmentation of the educational program.

Staff raised concern regarding central office guidance to always fulfill all parent requests for assessment, denying schools the possibility to lawfully decline assessment requests with a Prior Written Notice (PWN) letter, citing pressure related to the BPSB

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lawsuit. Staff also noted some site administrators instructing families to request assessments to identify and place students out of the general education classroom.

Staff members described a prevailing culture in which special education eligibility is utilized as a mechanism for transferring students out of the general education program or even the school itself. This practice is often encouraged by site administrators, further reinforcing the trend of high referral and identification rates. In addition, staff expressed concerns regarding certain labor contract provisions that may incentivize making students eligible for special education, potentially contributing to disproportionate referrals and placements.

The Action Plan and Outcomes are designed to enhance the referral and identification process for special education by implementing a standardized approach to comprehensive assessments. This approach prioritizes the exclusion of factors that may not warrant special education placement, such as cultural and linguistic differences. The process will also emphasize the requirement for prereferral general education interventions, ensuring that these supports are provided before considering special education evaluation.

Improved documentation will be required to demonstrate the fidelity of implementation and progress monitoring of these interventions. By focusing on these elements, the Action Plan seeks to build stronger practices and increase capacity within the system, ensuring that special education identifications are based on robust and comprehensive evaluation procedures. The overarching goal is to ensure that all identifications are justified and appropriately address individual student needs.

When students are determined to be eligible for special education services, it is essential that the process guarantees access to sufficient support and services within the general education environment whenever feasible. The guiding principle is to provide interventions and accommodations in the least restrictive setting, maximizing opportunities for students to remain in general education classrooms alongside their non-disabled peers.

Placement decisions that involve moving students to more restrictive environments must be carefully justified. Such decisions should only be considered after comprehensive support has been implemented within the general education setting and it has been established—based on documented evidence from the IEP team—that the student's needs cannot be adequately addressed in the general education classroom. This approach ensures that all possible resources in general education are utilized before resorting to alternative placements, promoting equity and appropriate access to educational opportunities.

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Baseline Performance

Baseline performance was utilized to inform data-based outcomes and establish requirements for the Action Plan. For context, the statewide identification rate for students receiving special education services is 15.0%. Outlined below are the IM's baseline performance for special education in general and in specific eligibility categories.

Identification Rates of Special Education Eligibility (General) by Race/Ethnicity and English Learners (ELs)

Baselines by Race/Ethnicity

- The overall special education identification rate is 18.7%, surpassing the state average of 15.0%. This indicates that approximately 19 out of every 100 enrolled students are identified as needing special education services
- The lowest identification rates were observed among Asian (11.5%), Native Hawaiian/Other Pacific Islander (11.8%), and Filipino (15.0%) students
- White students had an identification rate of 17.0%, which is higher than the state average but lower than the district average of 18.7%
- Hispanic (19.5%) and multiracial (19.8%) students exhibited rates above the district average
- Black students had a special education identification rate of 29.4%, with a risk ratio of 1.70, consistent with being at risk for disproportionate overrepresentation
- American Indian/Alaskan Native students showed an identification rate of 29.1% and a risk ratio of 1.56, consistent with being at risk for disproportionate overrepresentation
- Both Black and American Indian/Alaskan Native student groups demonstrated identification rates nearly double the state average of 15%. Approximately one-third of students in these groups are identified with a disability

Baselines for English Learners

- 1,412 English learners were identified as requiring special education services, accounting for 18.6% of the special education population
- The risk for English learners is 17.6%, which is slightly below the district rate of 18.7%
- Among Hmong English learners, the risk of being identified as requiring special education services is 26.1%, indicating that approximately one in four Hmong English learners is classified with a disability
- The risk ratio of 2.22 is consistent with disproportionate overrepresentation

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Identification rates of Students, including ELs, in Specific Eligibility Categories

Baselines for Students Identified with Emotional Disability (ED)

- A total of 159 students were identified as having ED, accounting for 2.1% of the special education population
- The overall risk of ED eligibility is 0.4%
- Black students comprise 11.6% of the general student population and 18.2% of the special education population, but represent 33.3% of the ED population, indicating overrepresentation based on their composition index
- The rate or risk for ED identification among Black students is 1.1%
- Black students' risk ratio is 3.83, indicating significant disproportionality
- For comparison, Hispanic students constitute the largest enrolled student group and exhibit a rate or risk of 0.2%

Baselines for Students Identified with Other Health Impairment (OHI)

- 1,183 eligible students were identified with OHI, representing 15.6% of the special education population
- The overall risk of OHI identification is 2.9%
- The risk for Black students is 6.6%, with a risk ratio of 2.71, consistent with disproportionate overrepresentation.
- American Indian/Alaskan Native students' risk of 6.6% and a risk ratio of 2.27, is consistent with disproportionate overrepresentation
- In contrast, Hispanic (2.6%), White (3.0%), and multiracial (4.0%) students' rates are near the district average of 2.9%, while Asian (0.7%), Filipino (0.7%), and Native Hawaiian/Other Pacific Islander (1.5%) students demonstrate considerably lower rates

Baselines for Students Identified with Specific Learning Disability (SLD)

- A total of 2,446 students were identified with specific learning disability (SLD), representing 31.1% of the special education population
- The risk of being identified with SLD is 6.0%
- Black students' risk is 9.8% and demonstrate a risk ratio of 1.75, which is consistent with being at risk for disproportionate overrepresentation
- American Indian/Alaskan Native students' risk is 10.3%, with a risk ratio of 1.71, consistent with being at risk for disproportionate overrepresentation
- Hispanic students present a 7.3% risk
- English Learner (EL) students demonstrate a risk of 7.5%, exceeding the overall risk rate of 6.0%
- Hispanic ELs display a 10.1% risk for SLD identification, with a risk ratio of 1.59, consistent with being at risk for disproportionate overrepresentation

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- Asian ELs show a risk of 3.4% and a risk ratio of 2.29, indicating disproportionate overrepresentation
- Hmong ELs demonstrate a risk of 11.8% and risk ratio of 5.73, indicating significant disproportionality

Baselines for Students Identified with Intellectual Disability (ID)

- A total of 252 students were identified with ID representing 3.3% of the special education population
- The overall risk for identification with ID is 0.6%
- Black students' risk is 1.1%, with a risk ratio of 1.89, indicating being at risk for disproportionate overrepresentation
- English Learners (ELs) account for approximately one-quarter of students with ID (23.4%, or 59 of the 252 eligible students)
- The risk for ELs being identified with ID is 0.7%, with Hispanic ELs at 0.9%. The risk ratio for Hispanic ELs is 1.64, consistent with being at risk for disproportionate overrepresentation
- More than half of Hmong students eligible with ID (7 out of 13) are English Learners; the risk for Hmong ELs is 1.2%, with a risk ratio of 3.64, indicating significant disproportionality

Baselines for Students Identified with Speech and Language Impairments (SLI)

- A total of 1,881 students were identified with SLI, accounting for 24.8% of the special education population.
- The overall risk of being identified with SLI is 4.6%
- Among American Indian/Alaskan Native students, the risk is 7.5%, with a risk ratio of 1.62, consistent with being at risk of disproportionate overrepresentation
- English Learners (ELs) have an SLI identification risk of 4.1%, which is below the overall rate
- Within the Hmong EL subgroup, the SLI rate is 6.1%, with a corresponding risk ratio of 1.44 that does not show disproportionate overrepresentation

Data-Based Outcomes and Action Plan Requirements

The outcomes outlined below are focused on minimizing the inappropriate and disproportionate overidentification of students—particularly Black students—in special education programs and specific eligibility categories. The central goal is to guarantee that all schools adhere to a standardized, consistent, and fair process for referring, assessing, identifying, and placing students who are considered for special education assessments. The process must be incorporated within the Comprehensive Evaluation Process (CEP) for the following eligibilities: emotional disability, other health impairment, intellectual disability, autism, specific learning disability, and speech and language impairments.

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Schools are required to provide substantial opportunities for students to participate in general education interventions to the greatest extent possible before initiating any special education assessment. Assessments must lead to identifications that are well-supported, placing particular emphasis on eliminating possibilities and thoughtfully evaluating exclusionary factors. This includes conducting a comprehensive review of second language acquisition factors for English Learners (ELs).

Goals 16a (Emotional Disability—ED) and 16b (Other Health Impairment—OHI) are designed to bring the risk levels for Black students into closer alignment with those of their non-Black peers in special education. The intended outcome is to achieve similar identification rates across groups, eliminating disparities.

Outcome #15: Compliance with the Elements of CEP Checklists for Students Assessed for Initial or Reevaluation IEPs

By September 30, 2031, the District will demonstrate 90% compliance with the elements of the CEP checklists for all students referred to an initial, reevaluation, or triennial IEP.

Outcome #16a: Reduction in the risk of ED Identification for Black Students

By September 30, 2031, the District will reduce the rate of Black students identified with emotional disability (ED) to 0.4, aligned with the overall rate of identification.

Outcome #16b: Reduction in the risk of OHI Identification for Black Students

By September 30, 2031, the District will reduce the rate of Black students identified with other health impairment (OHI) to 2.9, aligned with the overall rate of identification.

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Disproportionality in Special Education and Specific Eligibility Categories		
Required Actions	Goal(s)	Directives
2A.1 Develop, review, or revise policies, procedures, and practices in accordance with established best practices to ensure accurate identification of students for special education services (See Appendix A). Policies should mandate referrals to, and participation in, general education academic, behavioral, and social-emotional interventions, to the greatest extent feasible prior to initiating a referral for special education assessment. This includes clearly defining expectations for the systematic implementation—such as frequency and duration—of interventions, establishing mandatory data collection protocols, and requiring ongoing progress monitoring. These requirements must be incorporated in a uniform Student Success Team (SST) process which collects and reviews such information. The referral and assessment process should focus on systematically ruling out the presence of a disability through thorough exclusionary considerations. These may include a student's limited participation in effective academic programs and interventions, linguistic and cultural differences, stages of second language acquisition, and factors related to socioeconomic challenges. Policies should provide clear guidance for conducting multifaceted and comprehensive assessments, for all areas of suspected disability, utilizing culturally and linguistically appropriate instruments. This includes employing diverse assessment methods—both formal and informal, standardized and non-standardized—as well as curriculum-based evaluations, observations across multiple environments, and the collection of student work samples to provide relevant information that directly assists IEP teams in determining the educational needs of the student.	Ensure policies and procedures reflect and guide best practices and are aligned to state and federal laws and regulations. Establish systemic capacity and practices that substantially reduce identification rates of students, in particular Black and EL students, for special education services. Implement accountability mechanisms for schools that inappropriately and/or disproportionately identify students, in particular Black and EL students, for special education services.	7, 8, 9, 10, 15, 20

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Policies should prohibit the use of cognitive referencing when determining eligibility of related services such as speech and language and occupational therapy.		
2A.2 Utilizing the <i>Comprehensive Evaluation Process</i> (CEP) checklist as a guiding framework, develop structured checklists to assist schools during the referral, assessment, identification, and placement procedures for the following eligibility categories: emotional disability, other health impairment, intellectual disability, autism, specific learning disability, and speech and language impairments. Once eligibility for special education services has been established, the checklist should direct teams to evaluate appropriate supports and services, including determining suitable levels of frequency and duration. Teams are expected to provide support to the maximum extent possible, so that students may remain in the least restrictive environment (LRE). Placement decisions must be informed by the LRE analysis checklist, with documentation justifying any recommendations for more restrictive placements included on the checklist and IEP document. The checklist must identify students who are EL and incorporate compliance with the requirements of the CEP-EL checklist. The checklist should mandate that schools inform parents of their rights, including: their rights to dispute eligibility recommendations (including instances where students are determined ineligible), district assessment results, proposed service prescriptions (encompassing frequency, duration, and setting), and placement determinations (classroom setting and school). Parents must also be notified of their right to request an independent evaluation (IEE), their entitlement to compensatory services if schools fail to adhere to IEP requirements, the right to seek reimbursement for educationally related services including private school placements, and the right to file due process claims.	Ensure policies and procedures reflect and guide best practices and are aligned to state and federal laws and regulations. Establish a reliable data system that documents, stores, and tracks data, with the capacity to disaggregate data by race/ethnicity and disability. Implement accountability mechanisms for schools that inappropriately and/or disproportionately identify students, in particular Black and EL students, for special education services.	7, 8, 9, 10, 15, 20

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Furthermore, the process and accompanying checklist must address exceptions—such as parental requests for assessments—and require sufficient documentation supporting the exclusion of any components from the process. Guided by the Comprehensive Evaluation Process – English Learners (CEP-EL) manual, the checklist and/or forms should assist schools in systematically considering cultural and linguistic factors, as well as stages of second language acquisition, when evaluating students who are English Learners (ELs). All checklists must be incorporated into the student's IEP documentation.		
2A.3 Review and update policies, including the SELPA procedural manual and parent handbook, to ensure they address the assessment, identification, and placement requirements outlined above (See Appendix A). Develop and implement professional development programs addressing these new requirements.	Ensure policies and procedures reflect and guide best practices and are aligned to state and federal laws and regulations.	7, 8, 9, 10, 14, 17
2A.4 All relevant checklists will be compiled on a monthly basis, with physical copies retained at each school site. The Office of Independent Monitoring (OIM) will collect these documents for compliance review.	Implement accountability mechanisms for schools and administrators who inappropriately and/or disproportionately identify students, in particular Black and EL students, for special education services.	7, 8, 9, 10, 20, 21
2A.5 Establish a comprehensive training program and schedule for school administrators, school psychologists, speech-language therapists, and other relevant personnel to facilitate the effective implementation of the	Establish systemic capacity and practices that substantially reduce	7, 8, 9, 10, 15, 17, 20, 21

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Action Plan's objectives aimed at reducing both inappropriate identification and disproportionate overidentification of students with disabilities—particularly among Black students and English Learners. The training content should be thoughtfully developed to address the specific areas outlined in the checklists, rather than focusing solely on checklist implementation. Additionally, training must encompass procedures for data collection and maintenance related to the checklists, as well as documentation of general education interventions.	identification rates of students, in particular Black and EL students, for special education services. Establish a reliable data system that documents, stores, and tracks data, with the capacity to disaggregate data by race/ethnicity and disability.	
2A.6 Set clear protocols for assessors evaluating students, including English Learners. Protocols should specify recommended tools for each assessment area, valid methods for English Learners, interpreter use guidelines, exclusionary and eligibility criteria procedures, and assessment report requirements.	Ensure policies and procedures reflect and guide best practices and are aligned to state and federal laws and regulations.	7, 8, 9, 10
2A.7 Develop support systems for service providers, including but not limited to school psychologists, speech and language therapists, and occupational therapists, to facilitate the review of assessment findings and reports for cases requiring technical assistance.	Establish systemic capacity and practices that substantially reduce identification rates of students, in particular Black and EL students, for special education services.	7, 8, 9, 10, 15, 20
2A.8 In collaboration with OIM staff, perform a root cause analysis of the factors contributing to the overidentification of Hmong students, including those classified as English Learners. The review should involve consultation with experts or practitioners from the Hmong community, who can offer valuable	Establish systemic capacity and practices that substantially reduce identification rates of students, in particular	20

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cultural insights and perspectives to enhance assessment practices and reduce overrepresentation.	Black and EL students, for special education services.	
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Section 3. Disproportionality in Least Restrictive Environment (LRE) Placement in the 40% or less Category

This section examines whether overrepresentation and disproportionality are present among Black students in placements of the least restrictive environment (LRE) of 40% or less in the general education setting. This category is the most restrictive, where students are removed from general education settings and their nondisabled peers for the majority of their instructional day.

LRE is reported through three reporting categories including:

- 80% or more of the day in the general education setting
- 40-79% of the day in the general education setting
- 40% or less of the day in the general education setting

The presence of overrepresentation within certain student groups may suggest inappropriate placements in more restrictive settings, lack of capacity or training on inclusive practices including differentiated instruction, and a culture of viewing placements as the intervention or solution for struggling students.

Enrollment data from the 2025–26 school year were used to examine LRE data. When examining disproportionality, particularly when using the risk ratio measure, risk ratios must be reviewed differently when examining representation in desirable categories. For example, a risk ratio of 2.0 in the category of 80% or more, which is considered a more desirable placement, shows an overrepresentation that in this case is favorable to one group compared to others. In these instances, underrepresentation is better. Similarly, a higher risk will be associated with more access to general education placements.

The LRE data review identified students placed in highly restrictive settings (40% or less in general education) and those attending separate special education schools, like centers and non-public schools. About 25% of students are in the most segregated placements, nearly double the national and state average.

School officials identified several reasons contributing to the high rate of segregated placements among students. Behavioral challenges and a growing population of students with autism and OHI were cited as significant factors. Additionally, there exists a prevailing culture within the district that tends to assign students with challenging behaviors to special day classes (SDCs) or nonpublic schools instead of offering appropriate support to address their individual needs. Staff observed that SDCs frequently have higher adult-to-student ratios, with many students receiving one-on-one aide support. Staff additionally observed that inadequate implementation of behavioral supports by one-to-one aides may contribute to the placement of students in more

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restrictive environments. Interviews further revealed a widespread perception that SDCs are seen as the solution for many students experiencing behavioral difficulties.

Significant concern emerged based on comments from two separate groups, who expressed the opinion that assigning two extensive preschool classes to the Morse Therapeutic Center was beneficial and served to prevent these students from being placed in nonpublic school (NPS) settings. While this viewpoint was intended to highlight a perceived advantage, it underscores a broader systemic issue: the tendency to approach students with disabilities through a stigmatized and stereotypical lens. This perspective relies on outdated special education practices that prioritize the removal and segregation of students from their neurotypical peers, rather than ensuring that necessary supports are provided within the least restrictive environment (LRE).

This approach is particularly troubling given the young age of the students involved, who could greatly benefit from exposure to neurotypical classmates modeling age-appropriate language and social behaviors. By supporting more restrictive placements and viewing them as solutions, such beliefs further reinforce the denial of access to less restrictive, more inclusive educational settings. This mindset reflects a cultural tendency to view special education as the sole solution for students with disabilities, without adequately considering or providing support for inclusion.

Additionally, it was observed that the extensive preschool program at Morse Therapeutic Center had not received any curriculum, despite being in operation since the beginning of the school year. The absence of a curriculum raises further concerns about the quality and effectiveness of these placements, suggesting that they do not provide an improved educational environment or meaningful opportunities for student development.

A review of LRE data revealed errors in student enrollment for separate schools. Of 336 students, 120 were incorrectly coded as attending separate schools, but had comprehensive schools listed instead. Their enrollment at a center or NPS for that school year could not be verified in SIS. Correcting these inaccuracies changed the reported rate for separate schools from 4.8% to 2.8%, a significant shift since the district must reach 2.0% to meet CDE targets under the State Performance Plan Indicator.

Frequent disciplinary removals, transfers, as well as high rates of special education identifications and placements in more restrictive settings indicate a tendency to use special education as a way to remove students whose needs are not met in general education or less restrictive environments. Staff expressed concern that the district has a longstanding pattern of removal and segregation, instead of supporting students with academic, behavioral, and mental health needs.

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Site administrators at inclusive schools emphasized a strong cultural mindset of ownership for all students, including those with moderate to severe disabilities. This commitment is reflected in staff attitudes and engagement, as they consistently strive to find solutions to support students within the general education program. The lack of options for placing students in more restrictive settings further reinforces staff engagement and encourages a focus on addressing individual needs in less restrictive environments.

Despite their dedication, staff reported facing significant challenges in enhancing inclusive practices. The primary barriers identified were insufficient training and limited resources, which hinder efforts to provide effective support for all students. Resource inequities were highlighted as a major concern, especially regarding staffing allocations. According to contractual obligations, special day classes (SDCs) are assigned two instructional aides, whereas fully inclusive sites do not qualify for these additional staff members. This discrepancy perpetuates inequities for students with disabilities, restricting their access to the general education curriculum and undermining the goal of inclusive education. Although not classified as an inclusive school, one site reported leveraging Tier 1 social emotional learning (SEL) curriculum to support the mainstreaming of students with disabilities (SWDs), including those with moderate to severe disabilities. This approach highlights the advantages of strengthening Tier 1 supports, which foster more inclusive educational environments and practices, facilitate natural integration opportunities for SWDs, and ultimately benefit the entire student body.

The following baselines were evaluated in formulating data-driven outcomes and Action Plan requirements. National averages, along with CDE Performance Plan Indicators (PPI) LRE improvement targets, served as comparative benchmarks for assessing desired performance levels.

Baseline Performance

National Averages for LRE categories are as follows:

- 80% or more in general education classes – 67%
- 40-79% in general education classes – 16%
- 40 or less in general education classes – 13%
- Separate special education schools – 2%

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LRE 80% or more in General Education Setting

- A total of 4,952 students or 65.3% of all SWDs (rate or risk) are educated in the general education setting for 80% or more of the day. This performance is slightly below the national average of 67.0%
- Hispanic students' risk is 66.7%, slightly above the overall rate.
- White students' rate or risk is 73.0%, the highest amongst all student groups
 - Risk ratio of 2.48, meaning they are almost 2.5 times more likely to be integrated for 80% or more in the general education setting than all other non-white SWDs, consistent with disproportionate overrepresentation
- Black students make up 18.2% of special education enrollment and 16.2% of students in this category, showing underrepresentation (composition index)
- Black students' risk of 58.4%, with a risk ratio of 0.87, confirms underrepresentation
- The rate for Filipino (51.9%) and Native Hawaiian/Other Pacific Islander (52.9%) students also indicates underrepresentation

LRE 40-79% in General Education Setting

- A total of 584 out of 7,586 students demonstrate placements in the general education setting between 40-79% of the instructional day.
- The overall rate or risk for students being placed in the 40-79% category is 7.7%, meaning that almost 8 out of 100 students participate in the general education setting for most of the day.
- Black students' risk is 9.9%, showing slightly higher rates than the district average
- White students' risk is 5.1%, showing lower rates than the district average

LRE 40% or less in General Education Setting

- A total of 1,895 students or 25.0% of all SWDs (rate or risk) are in placements of 40% or less in the general education setting
- Black students make up 21.3% of all students in this category, compared to 18.2% of representation in special education (composition index)
- Rate or risk of Black SWDs is 29.3%, higher than district rate
- Rate or risk of Filipino SWDs is 35.8% and Native Hawaiian/Other Pacific Islander is 37.8% are higher than district average
- White students' risk is 19.7% showing the lowest rates of students in most restrictive settings

Separate School Placements

- A total of 216 students are placed in separate schools

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- Risk of a SWD to be placed at a separate school is 2.8%
- Black students make up 27.8% of all students placed in separate schools
- Black students' risk of being placed in separate schools is 4.3% with a risk ratio of 1.73, consistent with being at risk for disproportionate overrepresentation
- Students with Autism make up 62.0% of all students in separate schools
- The risk for students with autism to be placed in separate schools is 9.2%
- Students with OHI make up 15.7% of all students in separate schools
- Students with ED make up 10.7% of all students in separate schools
- Students with ED risk for being placed in separate schools is 14.5%
- The review found 120 inaccurately coded students who were not enrolled at Separate Schools. This resulted in a lowering of the placement rate from 4.8% to 2.8%, showing the impact of inaccurate data on performance.

Data-Based Outcomes and Action Plan Requirements

Targeted interventions will improve the placement process by standardizing LRE practices, enhancing support in general education settings, reviewing the program features of special day classes, and creating a framework to increase LRE time for students in highly segregated environments.

The following outcomes aim to reduce placements in highly segregated settings (defined as 40% or less time in general education or separate schools), especially for Black students. The goal is to create fair, consistent processes that prioritize placement in the least restrictive environment (LRE) by requiring schools to use all available supports before considering more restrictive options. Schools must justify restrictive placements and regularly review these decisions during each student's annual IEP review and reevaluation.

The district must restructure its special education program by creating a new framework for LRE and special day classes. SDC programs should offer higher support levels, with defined curriculum, interventions in reading and math, positive behavior strategies, and mental health supports. The program must also set clear goals and strategies to increase mainstreaming opportunities for students.

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Outcome #17a: Reduction in Placement of Students in More Restrictive Placements of 40% or Less in the General Education Setting

By September 30, 2031, the District will reduce the rate of students placed in the LRE category of 40% or less in the general education setting to 12%, aligned with federal averages.

Outcome #17b: Reduction in Placement of Black Students in More Restrictive Placements of 40% or Less in the General Education Setting

By September 30, 2031, the District will reduce the rate of Black students placed in the LRE category of 40% or less in the general education setting to 8%.

Outcome #18: Reduction in Rate of Students Placed in Separate Schools

By September 30, 2031, the District will reduce the rate of students placed in Separate Schools to 2.0%, aligned with federal averages.

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Section 3. Disproportionality in Special Education Least Restrictive Environment Placements including the 40% or less in General Education Category and Separate Schools including Non-public Schools (NPS)		
Required Actions	Goal(s)	Directives
3A.1 Develop, review, or revise policies, procedures, and practices in accordance with established best practices to ensure schools develop IEPs to support placements in lesser restrictive placements to the maximum extent possible (See Appendix A).	Ensure policies and procedures reflect and guide best practices and are aligned to state and federal laws and regulations. Establish systemic capacity and practices that substantially reduce placement rates of students, in particular Black students, in more restrictive placements of 40% or less in the general education setting and separate schools.	3, 4, 5, 10,12, 17
3A.2 Establish a districtwide LRE framework that examines the special education instructional and delivery program to ensure equitable and consistent programs, that include but not limited to: frameworks for specialized programs that identify unique features of each particular class (i.e., autism, ED, ID, etc.), highlighting the supports and services that are found in the program that cannot be provided in the general education setting, class norms, base teacher/adult to student ratios, curriculum offerings, and positive behavior supports to be implemented. The framework shall include a review and analysis of its overall preschool and kindergarten programs (including transition kindergarten/TK) and	Ensure policies and procedures reflect and guide best practices and are aligned to state and federal laws and regulations. Establish a reliable data system that documents, stores, and tracks LRE data, with the capacity to	3, 4, 5, 10, 12,17

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include strategies for establishing mixed (general and special education) or inclusive placements for pre-school students. The framework must identify strategies and a plan to create opportunities to meaningfully integrate students within the general education instructional program (not recess and lunch or assemblies). This includes identifying partner classrooms as well as core curriculum content classes (i.e., all students will participate in PE and electives). This should also include a review of the resource specialist program (RSP) delivery model at primary and secondary schools, to identify how these providers and programs can facilitate and bridge students' participation in the general education instructional setting. The framework must establish an inclusion support criteria (assessment) and service model, aimed at increasing the time students enrolled in SDCs spend in the general education instructional program (not recess, lunch, assemblies, or passing periods), particularly those with moderate to severe disabilities on the alternate curriculum. The structure should support students and general education teachers by implementing strategies such as but not limited to: differentiating instruction, modifications to core curriculum and assignments, environmental behavioral accommodations, co-teaching and collaboration, coaching, and IEP implementation. The initiative should include staffing requirements (job description) for inclusion specialists or support teachers, including job position requirements that include experience and/or training in the following: providing inclusion support to students with moderate to severe disabilities, modifying core curriculum, implementing alternate curriculum, positive behavioral intervention plans (BIPs), and crisis prevention and intervention (CPI). Staffing needs should focus on the inclusion specialist as an itinerant service provider, with an emphasis on maximizing direct service provision to students.	disaggregate data by race/ethnicity and disability. Establish systemic capacity and practices that substantially reduce placement rates of students, in particular Black students, in more restrictive placements of 40% or less in the general education setting and separate schools.	
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The framework must examine placements (assigned location) of special day class programs including feeder patterns to ensure equitable access for when students matriculate to the next level with the aim of maintaining students at or as close to their neighborhood schools as possible. The framework must include an implementation timeline with full implementation occurring during the 2029-30 school year.		
3A.3 In collaboration with the OIM, conduct a review and analysis of the District's Autism and Emotional Disability (ED) programs. The review should examine the IEPs of students with autism and ED attending separate schools and conduct a root cause analysis to identify reasons why comprehensive sites could not meet their needs. It should compare program features between comprehensive special day classes and separate school placements and develop strategies to maintain more students with autism and ED on comprehensive campuses, and in the general education setting. The analysis should include a review of the support and services of all students in separate schools prior to their placement to these more restrictive settings to determine if schools provided high level of support prior to making a recommendation for a change of placement.	Establish systemic capacity and practices that substantially reduce placement rates of students, in particular Black students, in more restrictive placements of 40% or less in the general education setting and separate schools.	3, 4, 5, 20
3A.4 Develop an LRE analysis checklist to guide IEP teams in the placement decision making process that ensure students are offered sufficient supports and services to maintain students in the general education setting to the maximum extent possible. Placements in more restrictive settings may only be considered when attempts to educate a student in the general education setting has failed, or when the student requires supports and services in a more restrictive placement that cannot be provided in the general education setting. For students currently in more restrictive placements, IEP teams must reevaluate and justify such placements including by adding appropriate support and services to the students IEP.	Establish systemic capacity and practices that substantially reduce placement rates of students, in particular Black students, in more restrictive placements of 40% or less in the general education setting and separate schools.	3, 4, 5, 10,12, 21

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The checklist must be designed to address the four-prong test associated with <i>Rachel H.</i> and require justifications by IEP teams for making more restrictive placements. The Checklist should also guide teams in the accurate calculation and reporting of LRE data, as well as require having teams enter a student's daily or weekly schedule to ensure alignment.		
3A.5 Review and update policies and procedures, including the SELPA Procedural Guide and Parent Handbook, as well as creating any new policies and procedures related to the LRE Framework, LRE Analysis Checklist, Inclusion Support as a designated instructional service, and data entry, maintenance and reporting requirements.	Ensure policies and procedures reflect and guide best practices and are aligned to state and federal laws and regulations.	3, 4, 5, 14
3A.6 All relevant checklists will be compiled monthly, with physical copies retained at each school site. The Office of Independent Monitor (OIM) will collect these documents for compliance review.	Implement accountability mechanisms for schools and administrators who do not comply with the processes included in the LRE Checklist.	3, 4, 5, 21
3A.7 Develop and implement professional development programs addressing all new requirements and facilitate the effective implementation of the Action Plan's objectives aimed at improving LRE practices, and in particular, overrepresentation of Black students in more restrictive placements including SDC programs (40% or less in general education) and separate special education schools. The training content should address specific areas outlined in the checklists, rather than focusing solely on checklist implementation. Additionally, training must encompass procedures for data collection and maintenance related to the checklists, as well as documentation of supports	Establish systemic capacity and practices that substantially reduce placement rates of students, in particular Black students, in more restrictive placements of 40% or less in the general education setting and separate schools.	3, 4, 5, 17, 21

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and services attempted prior to recommending a more restrictive placement. The comprehensive training program must include a schedule for priority staff including school administrators, school psychologists, special education teachers/case managers, related service providers, and other relevant personnel.	Establish a reliable data system that documents, stores, and tracks LRE data, with the capacity to disaggregate data by race/ethnicity and disability.	
3A.8 Develop periodic (at a minimum three times per year) reporting mechanisms to share and discuss LRE data with site administrators, including principals and vice/assistant principals. The review should aim to support administrators in establishing improved IEP practices and service delivery models, in particular for schools with high numbers of SDC programs.	Establish systemic capacity and practices that substantially reduces placement rates of students, in particular Black students, in more restrictive placements of 40% or less in the general education setting and separate schools.	3, 4, 5, 21, 22

Section 4. Compliance with IEP Timelines (Initials, Annuals, Reevaluations), Parental Participation at IEP Meetings, and Provision of Interpreters at IEP and Translation of IEP Meetings and Documentation

Section 4 provides an in-depth review of practices related to Individualized Education Programs (IEPs). This section covers several key areas: adherence to timelines for initial assessments, reevaluations, and annual reviews; parent involvement, specifically measured by attendance at IEP meetings and procedures in place to ensure parents are recognized as equal members of the IEP team; and the accessibility of translation and interpretation services for IEP meetings and documents. To guide improvement, baselines and data-driven outcomes have been established for each focus area, and corresponding Action Plan items are identified for integration into the District's Implementation Plan.

Baselines regarding the timeliness of IEP meetings—including initial, reevaluation, and annual reviews—are based on a sample of IEPs conducted during the 2024-25 school year. Although multiple efforts were made to gather comprehensive data for all students, the district was unable to provide a complete dataset. Less than half of the students' IEP data was supplied, and this sample contained duplicate records and lacked essential information needed to effectively analyze the timeliness of meetings. This inability to produce high-quality data raises significant concerns about the district's capacity to monitor compliance with IEP timelines and other special education requirements mandated by state and federal laws.

In addition, incomplete and inaccurate data was prevalent, showing a lack of adequate mechanisms to ensure quality data. Moreover, schools reported little to no oversight from central office related to notifying them of overdue IEPs or corrective actions to ensure IEPs were completed.

The issue of overdue IEPs continues to persist and is largely attributed to structural deficiencies and inadequate oversight by both site and central office administrators. The absence of comprehensive policies and procedures, combined with these structural weaknesses, has resulted in ineffective case management. Responsibility for managing cases often falls on special education teachers, such as Resource Specialist Program (RSP) and Special Day Class (SDC) teachers, who receive minimal support from administrators or clerical staff. Officials have noted that the lack of administrative oversight leads to inconsistent practices among case managers and little accountability for overdue IEPs.

Staff members have indicated challenges in obtaining timely access to their caseloads and the Individualized Education Programs (IEPs) for students they serve, which contributes to overdue IEPs and delays in service delivery. The current procedure requires schools to submit requests or tickets to the special education applications department, which manages special education data within the SEIS system. Staff have observed that access to IEPs may take several weeks, and the removal of students from caseloads can be delayed, with some schools reporting durations ranging from months to years.

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While the special education applications department conducts periodic reviews of overdue IEPs and provides reports to central office staff, these measures appear to be insufficient and do not achieve the desired outcomes. These access challenges further prolong delays and hinder effective case management and service provision for students requiring special education support.

School officials reported that site administrators demonstrated inconsistent practices with regard to participation in IEP meetings. In some cases, administrators rarely attended these meetings, while in others, they participated only partially, often entering and leaving during the proceedings. In contrast, there were instances where administrators remained present and fully engaged throughout the entirety of the meeting. Several contributing factors were identified for limited engagement, including the absence of assistant or vice principals, as well as a lack of support staff such as counselors, who could provide coverage and allow administrators to participate more consistently in IEP meetings. Elevated levels of student identification and the number of students served influence consistent participation; certain schools have noted challenges in attendance stemming from the considerable volume of Individualized Education Program (IEP) meetings conducted each year.

The district currently does not have the capacity to generate data extracts necessary for analyzing parent attendance at IEP meetings. While this limitation is partially attributed to restricted access to data indicators established by the San Joaquin County Office of Education, it remains essential for the district to develop its capabilities to effectively monitor parent participation.

To establish baselines in this area, a sample of 959 students was selected for an in-depth review of Individualized Education Programs (IEPs) to assess parent participation. Due to time constraints, IEP records were reviewed for 775 students. The review process began by confirming whether an IEP meeting had occurred during the 2024-2025 school year for each student. This was followed by verification of attendance by a parent, guardian, or adult student. Participation was recognized if the parent attended in person, by phone, or through a virtual platform.

Data sources included meeting notes, signed consent or excusal forms, and present level pages. The findings indicated that the parent attendance rate at IEP meetings was notably high, with 84.6% of meetings showing verified parent participation.

However, the data collection process also revealed several concerns related to documentation and meeting completion. Specifically, 17 IEPs (2.3%) were found to have incomplete meeting notes pages, outdated present levels, or missing uploads of consent forms. These gaps made it difficult to confirm whether a meeting had taken place and whether a parent was present.

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Additionally, 38 students (4.9%) were identified as not having had a meeting during the 2024-2025 school year, with seven students still lacking a meeting in the current academic year. This issue was further highlighted by parent surveys, which pointed out that parents often had to contact IEP teams to remind them when their student's annual meeting was overdue.

A phone survey was conducted to gather input from families about their experiences participating in their child's Individualized Education Program (IEP) meetings. Out of a sample of 195 families, feedback was obtained from 83 respondents. All participants reported that they had attended at least one IEP meeting during either the current or previous school year.

The survey results revealed that the majority of families—72.3%—felt their level of involvement was “about the right amount.” However, 27.7% of respondents expressed a desire for greater involvement in the IEP process. The survey also identified differences in satisfaction among various racial and ethnic groups. Among White parents, 93.8% (15 out of 16 respondents) reported satisfaction with their level of involvement. In contrast, only 65.4% of Black parents and 61.1% of Hispanic parents expressed satisfaction, indicating that nearly one third of Black and Hispanic parents wished to be more involved in their child's IEP meetings.

Overall, the majority of parents reported positive experiences with their child's special education services. Specifically, 77.1% of respondents described themselves as “Very Satisfied” (45.8%) or “Somewhat Satisfied” (31.3%) with the support provided. Despite this generally favorable feedback, several challenges emerged across the sample. These challenges included the need for parents to actively advocate for their child's services, concerns about consistent service delivery, and issues related to the timeliness of IEP meetings. Approximately 21.7% of parents indicated that their child received only some or none of the services listed in their Individualized Education Program (IEP), while 4.8% were unsure if their child was receiving any services at all.

Furthermore, nearly 40% of families reported expending considerable effort in securing the services their child needed, with 24.1% putting forth “Some Effort” and 15.7% investing “A Great Deal of Effort.” During interviews, some parents noted difficulties such as not knowing who their child's service provider was or having to remind the IEP team when annual meetings were overdue. These issues highlight ongoing areas for improvement in communication and case management within special education services.

Although available data show that parents frequently attend Individualized Education Program (IEP) meetings, concerns persist regarding the depth and effectiveness of their involvement. These concerns are especially pronounced when considered alongside elevated rates of disciplinary removals, an increased prevalence of segregated placements, and the comparatively low provision of behavioral and mental health supports. The intersection of these factors highlights the need to address not only parent presence but also the quality and impact of their participation in the IEP process.

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A review of language access services, including interpretation during IEP meetings and translation of data requested by non-English speaking parents, revealed several gaps in the available information. The data provided does not contain essential details to determine whether requests were specifically for interpretation at IEP meetings or for translation of IEP documents and assessment reports. While the information references services being provided, most records categorize these services generally, making it difficult to establish clear baselines. As a result, baselines are determined solely on the number of requests submitted. Additionally, there is a lack of data regarding the timelines for completing these services and no information about unmet requests.

Language access services are currently managed by two separate units: the Matriculation and Orientation Center (MOC) and the Special Education department. Both units are responsible for collecting and maintaining data on the provision of interpretation and translation services. After several months and repeated follow-ups, the special education department eventually produced data. However, staff demonstrated limited understanding of the requests, including their timeliness and the specifics of the services provided. This lack of oversight and accountability is evident in the dataset, which includes only fulfilled requests and a small number of canceled requests, with no documentation of unmet requests.

An examination of social worker service logs stored in the EIS database revealed documentation of interpretation and translation services performed by staff members. Furthermore, certain locations indicated that parents receive translated IEPs through SEIS's automatic translation feature. These requests are not tracked by a centralized system and were excluded from baseline calculations due to insufficient details regarding the nature of the requests and the services provided.

To enhance compliance with IEP timelines, the outcomes and Action Plan requirements are structured to introduce clear mechanisms for effective case management and greater accountability. These measures are aimed at addressing persistent challenges related to overdue IEPs and inconsistent oversight, as previously described. By establishing these structural supports, the district seeks to ensure that case managers are provided with the necessary guidance and resources to manage IEPs efficiently and consistently. Current processes related to timely access to IEP data by school personnel should be reviewed and revised with consideration for enabling site administrators to perform these functions and improve efficiencies in providing students services.

In addition, improving meaningful parent participation is a key component of the action plan. Schools will be mandated to begin each IEP meeting by reading a statement that informs families of their rights as equal members in the decision-making process regarding supports, services, and placement.

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The district must also take steps to restructure its language access services. Currently, these services are managed by multiple departments, which has resulted in gaps in oversight and accountability. The restructuring must consolidate language access services into a single program to provide unified management and clear accountability. As part of this reorganization, procedures must be established to process requests in a timely manner, ensuring that interpretation and translation needs are met promptly. Additionally, comprehensive protocols for data collection and maintenance must be put in place to track service delivery and monitor compliance effectively.

Performance Baselines

Timely Completion of Initial IEPs

- Initial IEP timeline file contained 1,519 Initial IEP meeting with 1,494 valid cases for analysis
- A total of 1,046 initials, or 73.7%, were completed within the required 60-day timeline with about one-third (n=448, 31.6%) of meetings overdue
- 172 or 12.1% of overdue Initial IEPs were held between days 61-70, or up to 10 days overdue
- 150 or 10.6% of overdue Initial IEPs were held between days 71-90, or up to 30 days overdue
- 126 or 8.9% of overdue Initial IEPs were held after day 90, or beyond 30 days overdue

Timely Completion of Annual Review IEPs

- The sample included 1,915 annual review meetings with 1,451 valid cases analyzed
- About two-thirds (64.3%) of annual reviews were compliant
- 222 or 15.3% of annual reviews were overdue by 1 to 20 days
- 114 or 7.9% annual reviews were overdue between 21-50 days
- 63 or 4.3% of annual reviews were overdue 51-100 days
- 119 or 20% of annual reviews were overdue by more than 100 days

Timely Completion of Reevaluation IEPs

- The file contained 2,918 reevaluation IEPs with 1,679 valid cases analyzed
- 1,226 of reevaluation IEPs were actually initial meetings incorrectly marked
- 1,099 or 65.5% of re-evaluation IEPs were completed on time.
- 580 or 34.5% of re-evaluation IEPs were overdue

Parent Participation/Attendance at IEP meetings

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- A sample of 775 IEPs were reviewed to examine parent attendance rates
- 656 (84.6%) had meetings where a parent, guardian or adult student attended
- 64 (8.3%) students had meetings held without parents
- 17 (2.2%) meetings lacked the necessary information to determine parent participation
- 38 (4.9%) students did not have a meeting during the 24-25 school year

Provision of Interpretation and Translation of IEP Meetings and Related Documents

- A total of 2,022 requests made were fulfilled
- 1,479 or 73.1% were requested for Spanish language services with all other languages consisting of 543 (26.9%) of requests
- Most requests (n=1,751, 86.6%) were made for interpretation services at IEP or other meetings that were completed either in-person, virtually or by telephone.
 - Spanish requests consisted of 1,267 (72.4%) requests while other language requests made up 484 or 27.6% requests
- Requests for translation of documents consisted of 271 or 13.4% of all requests
 - The majority (n=212, 78.2%) were provided for Spanish speaking while other language families made up the remainder of requests (n=59, 11.8%)

Data-Based Outcomes

Timely Completion of IEP Meetings (Initials and Reevaluation, Annual Reviews) Timely Provision of Interpretation and Translation of IEP Meetings and Documentation

Outcome 19a: Timely Completion of Initials and Reevaluation IEP Meetings

By September 30, 2031, the District will complete 95% of all initials and reevaluation IEPs meetings within the timelines required by law.

Outcome 19b: Timely Completion of Annual IEPs

By September 30, 2031, the District will complete 90% of all annual plan review IEP meetings within the timelines required by law.

IEP meetings delayed due to parent availability or requests must provide written parental consent to hold the IEP meeting beyond the compliance timelines.

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Outcome 20: Timely Interpretation and Translation of IEP Meetings and Documentation

By September 30, 2031, the District will provide interpreters at IEP meetings and translations of IEP documents to 90% of families who request each service. Translation of IEP document and assessment reports must be provided within two weeks or ten school days. The District will accurately report requests and fulfillment of services for 95% of requests.

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Section 4. IEP Practices including IEP Timelines, Parent Participation and Language Access		
Required Actions	Goal(s)	Directives
4A.1 Develop, review, or revise policies, procedures, and practices in accordance with established best practices to ensure schools comply with timelines for holding initial, annual, and reevaluation IEPs; meaningful parent participation including providing access to interpreters and translation of IEP documents and assessment reports, as appropriate (See Appendix A).	Ensure policies and procedures reflect and guide best practices and are aligned to state and federal laws and regulations.	10
4A.2 Implement a system to track IEP meeting deadlines, alert schools of upcoming due dates at the start of each month, and report on both timely and overdue meetings. Schools must promptly schedule and conduct IEP meetings. If a meeting is over one month late, accountability measures, including progressive discipline, should apply.	Establish systemic capacity and practices that substantially increases the timely completion of IEP meetings.	10, 12, 21
4A.3 Case Managers will be responsible for running SEIS reports at the start of every year to create a master calendar of annual review and reevaluation IEPs due that school year. This master calendar must be updated at least three times per year and shared with all IEP attendees.	Establish systemic capacity and practices that substantially increases the timely completion of IEP meetings.	10
4A.4 Reevaluate and update site-level processes to improve case management. Ensure timely IEP meetings, make adequate efforts to engage parents, promptly affirm IEPs, and effectively communicate accommodations and supports to teachers and service providers as appropriate. Review roles, responsibilities, and resources at sites to ensure IEP compliance, including school administrators, case managers, and clerical staff.	Ensure policies and procedures reflect and guide best practices and are aligned to state and federal laws and regulations. Establish systemic capacity and practices that	10

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School administrators must oversee case management, including responsibilities for notifying parents of IEP meetings, ensuring IEPs and affirmed, and that accommodations and services are implemented on time. Underperforming schools must be held accountable, with extra training and support provided as needed.	substantially increases the timely completion of IEP meetings. Implement accountability mechanisms for schools and administrators who are out of compliance with IEP timelines.	
4A.5 Create, review, and update protocols to ensure case managers have timely access to IEPs when students start the year or transfer schools. Students must be exited swiftly when leaving the district or special education. Consider allowing site administrators to open or transfer IEPs as students move within the district. Procedures must include monthly reviews of IEPs that require updates due to student mobility or exit from special education and require schools and case managers to promptly affirm IEPs.	Ensure policies and procedures reflect and guide best practices and are aligned to state and federal laws and regulations. Establish systemic capacity and practices that substantially increases the timely completion of IEP meetings.	10
4A.6 Set clear standards for IEP team attendance and participation. All members, including site administrators or their designee, must attend the full meeting unless formally excused by parents. Site administrators should be familiar with district programs and have authority to allocate services or placements during the IEP.	Ensure policies and procedures reflect and guide best practices and are aligned to state and federal laws and regulations.	10

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4A.7 Set standards for IEP meetings to ensure parents are treated as equal partners, informed of their rights, and that all team members share decision-making authority. The IEP team can make decisions at meetings without seeking outside approval unless further information is needed. These standards must be communicated to parents and IEP team members at the start of every IEP meeting by reading a statement, which should also be available in writing. The statement is required at all meetings, even without parents present, and confirmation that it was read must be documented in the SEIS summary/notes before proceeding. It must also appear in the Parent Handbook and SELPA Procedural Guide. This statement must inform the participants that: • An IEP meeting is a collaborative process, and all participants will be provided with the opportunity to ask questions and provide recommendations and suggestions; • The IEP team has the authority and responsibility to design a program in which the child can derive meaningful benefit; • The draft IEP, behavior intervention plan, or assessment plan might change as a result of the IEP team’s deliberations; • The IEP meeting will continue until the IEP is complete, unless all members agree to an extension; • The decision on related services and placement will occur during the IEP meeting, unless the team agrees that there is not sufficient information to make a placement determination; • The district considers the family equal partners in the educational decision-making process; • Any team member may propose an objective or goal in the IEP, even if it is not included in the SEIS goal bank; and • That parents may request support to understand their rights and procedures if they disagree with assessment findings, placement, services, or supports and accommodations offered.	Ensure policies and procedures reflect and guide best practices and are aligned to state and federal laws and regulations. Establish systemic capacity and practices to improve meaningful parent participation.	10
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4A.8 Create a clear list of program options and service delivery models for families. Include this information in the Parent Handbook, SELPA Procedural Guide, on the district's special education website, and as hardcopies (e.g., pamphlets) at all sites.	Establish systemic capacity and practices to improve meaningful parent participation.	3, 4, 5, 10, 12,14,
4A.9 Streamline language access services by establishing a unified system for processing requests, selecting vendors, and managing data. This structure should update procedural guidance and forms for districtwide use. Collect data on request type (e.g., IEP meeting, parent conference), language, request and event dates, outcome (fulfilled by staff, vendor, unfulfilled, canceled), document translation type, and cost.	Establish systemic capacity and practices to improve meaningful parent participation.	10
4A.10 Create and deliver professional development programs covering new requirements to support the Action Plan's goals for enhancing IEP practices and meaningful parent participation. Provide training on the following, but not limited to: • working collaboratively in the IEP process; • best practices for communicating present levels of performance; • best practices for communicating offers of FAPE; • relationship - and trust-building strategies that promote ongoing relationships between District personnel (e.g., administrators, teachers, and providers) and parents; • the availability of all District resources and clarification of corresponding administrative processes' role in securing such resources; and • an IEP team's roles, responsibilities, and authority. The training program must outline a schedule for priority staff such as administrators, school psychologists, special education teachers or case managers, related service providers, and other relevant personnel.	Ensure policies and procedures reflect and guide best practices and are aligned to state and federal laws and regulations. Establish systemic capacity and practices that substantially increases the timely completion of IEP meetings. Establish systemic capacity and practices to improve meaningful parent participation.	10, 17

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4A.11 Establish reporting mechanisms at least three times a year to inform site administrators about IEP timeline compliance. These reviews should help administrators improve IEP practices and service delivery, especially in schools with high special education enrollments and SDC programs.	Establish a reliable data system that documents, stores, and tracks timely completion of IEPs, with the capacity to disaggregate data by race/ethnicity and disability.	10, 12, 21
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Section 5. Multi-tiered Systems of Supports (MTSS), including Reading Intervention Teachers and Bullying and Prevention Programs

The implementation status of the district's Multi-Tiered Systems of Supports (MTSS) was examined across the ten selected proof-of-concept schools. As part of this initiative, Reading Intervention Teachers (RITs) were assigned to elementary schools to support literacy development and targeted reading interventions. In addition to reviewing the deployment of RITs, the evaluation included findings derived from interviews and focus groups conducted with both central office and site-level staff. These discussions centered on the effectiveness of general education intervention processes, such as Student Success Team (SST) meetings.

This section also addresses protocols for handling complaints related to alleged bullying and harassment of students and staff. As part of this review, procedures for reporting and investigating these incidents are examined to ensure proper support and resolution for affected students. The analysis includes an examination of bullying and harassment data collected from the Student Information System (SIS). By analyzing these data, the section aims to establish baselines and identify data-driven outcomes, providing insights into the prevalence of such incidents and informing future prevention and intervention strategies within the district.

According to the California Department of Education (CDE), a Multi-Tiered System of Supports (MTSS) is defined as “an integrated, comprehensive framework that focuses on Common Core State Standards (CCSS), core instruction, differentiated learning, student-centered learning, individualized student needs, and the alignment of systems necessary for all students’ academic, behavioral, and social success.” This framework is designed to ensure that every student receives the support needed to succeed academically, behaviorally, and socially by aligning various systems and supports within the district.

Four key elements are commonly associated with effective MTSS frameworks:

- **Universal Screening:** All students are regularly screened to identify those who may need additional academic or behavioral support.
- **Progress Monitoring:** Student progress is consistently tracked to ensure that interventions are effective and to inform instructional decisions.
- **Multi-Level Prevention System:** Supports are provided at increasing levels of intensity based on student need, ensuring that interventions are responsive and targeted.
- **Data-Based Decision Making:** Instructional and intervention decisions are driven by data collected through screening and monitoring, ensuring that student needs are met through informed practices.

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The Multi-Tiered System of Supports (MTSS) utilizes a systematic and integrated three-tier structure to deliver instruction, supports, and services. This framework is designed to promptly identify students experiencing academic, behavioral, or social-emotional challenges and connect them with appropriate interventions. Each tier represents a different level of support based on student need:

- **Tier 1: Universal support for all students:** All students receive high-quality, evidence-based instruction in the general education classroom. Universal supports may also encompass the delivery of social-emotional learning curriculum and the implementation of schoolwide Positive Behavioral Interventions and Supports (PBIS) accessible to every student.
- **Tier 2: Targeted support for some students:** Students who are not making adequate progress with Tier 1 supports receive supplemental, small-group interventions. These targeted supports are designed to address specific skill deficits and help students catch up with their peers.
- **Tier 3: Intensive support for few students:** For students who continue to struggle despite Tier 1 and Tier 2 interventions, individualized and intensive supports are provided. These interventions are highly personalized and, if sufficient progress is not observed, may lead to consideration for special education evaluation.

While the structure of MTSS frameworks may vary by district and state, another component of an effective program is having functional and responsive schoolwide referral mechanisms such as Coordination of Services Teams (COST) and Student Study Teams (SSTs). COST can be viewed as a precursor to SST referrals and acts as the initial stage of intervention. This mechanism is a school function that unlike SSTs, does not include parents. These mechanisms ensure the early identification and referrals of supports and services to struggling students, that often include structured interventions and progress monitoring.

In alignment with the district's previous Action Plan, a dedicated MTSS design team was established to lay the groundwork for the Multi-Tiered System of Supports (MTSS) program. This team focused on developing essential Teaming Structures and Common Assurances that serve as the foundational components of the district's MTSS initiative.

To facilitate a thoughtful and informed rollout, ten elementary schools were selected as proof-of-concept sites. These schools were chosen to pilot the MTSS framework and provide valuable insights that would guide broader implementation across the district. As part of this initiative, each proof-of-concept school received targeted support, such as the assignment of dedicated MTSS specialists, social workers, and Reading Intervention Teachers (RITs). This comprehensive support structure was designed to ensure effective implementation and to address the diverse academic and social-emotional needs of students within these schools.

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Staff members from the designated proof-of-concept schools—including MTSS specialists and Reading Intervention Teachers (RITs)—reported encountering substantial challenges in implementing the Multi-Tiered System of Supports (MTSS). One primary obstacle was the lack of a uniform district-wide framework and standardized procedures for program development. This deficiency resulted in difficulties establishing or locating necessary forms and documentation for student referrals and intervention histories. Consequently, some personnel utilized materials from neighboring districts or independently created resources to fulfill these requirements. During a site visit, a valuable tool developed by Central Office staff was identified, which assists in inventorying supports and interventions according to tiers. Despite its use at one site, many participants from MTSS proof-of-concept schools did not reference this form or indicate that they had created a formal inventory.

Respondents described the progress and challenges in building Tier 1, Tier 2, and Tier 3 supports within their schools. These challenges spanned all three tiers, indicating widespread issues in both universal and targeted interventions as well as intensive supports. Furthermore, staff noted that the MTSS design committee had not convened during the current school year, leading to a lack of awareness regarding the initiative's status and future steps. This absence of coordination, oversight, and comprehensive training further hindered effective implementation, leaving staff uncertain about expectations and next steps.

The introduction of reading intervention teachers (RITs) has contributed to noticeable improvements within schools. Despite RITs noting concerns for greater structure and enhanced coordination, staff members reported that processes related to implementing reading interventions have become more consistent and effective. Participants noted the effective implementation of a universal screening tool, which enables systematic progress monitoring and supports comprehensive data collection. This initiative was prompted by the new state mandate requiring universal screeners for kindergarten through second grade to identify reading difficulties beginning in the 2025–2026 school year, for which the district selected DIBELS to fulfill this requirement.

These developments suggest that the presence of RITs is positively impacting the implementation of reading support and promoting more targeted practices in reading intervention. The widespread implementation of the DIBELS screener illustrates how universal adoption and mandated utilization of programs and assessments can advance best practices and provide equitable opportunities for all students.

An illustrative example of progress monitoring data emerged from a participant's observation of two classes at the same grade level. Over the first half of the year, one class demonstrated measurable academic growth, while the other showed limited progress. This discrepancy highlighted the importance of evaluating and enhancing the instructional programs specifically Tier 1 supports—in classes where student progress remains stagnant.

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This scenario underscores the effectiveness of the Multi-Tiered System of Supports (MTSS) when it is implemented universally across classrooms. Utilizing common assessment tools, ongoing progress monitoring, and data-driven decision making enables educators to identify areas of instructional need and respond to them systematically. By applying these practices, schools can ensure that all students benefit from high-quality instruction and timely interventions, reinforcing the value of MTSS as a comprehensive framework for educational improvement.

Several schools observed positive outcomes associated with the reading intervention and MTSS initiative (proof of concept participants), including reductions in disciplinary actions and referrals to SST or special education. While these trends are still developing, participants acknowledged that enhancing reading skills is critical for decreasing behavioral incidents and special education identification.

Staff members from different positions and school levels expressed concern regarding the absence of a common assessment and mandatory instructional program within the district. These inconsistencies led to difficulties in both progress monitoring and equitable referral processes. The variations in practice disproportionately affect students who are the most vulnerable, such as those with higher rates of mobility, limited English proficiency, or academic challenges stemming from poor quality instruction. Without a standardized instructional program and use of common assessments, undoubtedly contributes to increased rates of disciplinary actions, special education identification, and placements in more restrictive environments. These structural issues are within the district's authority to reform and mandate. Staff representing a range of positions, including SCTA members, who commented on these practices, including the prevalence of an opt-in culture, expressed a strong desire for the adoption of a systemic and uniform curriculum, common assessments, and consistent districtwide implementation of programs to ensure equitable outcomes for all students.

Staff members reported a range of practices concerning prereferral mechanisms such as Coordination of Services Teams (COST) and Student Study Teams (SSTs). Not all schools utilize COST, and the implementation of SSTs varies significantly from site to site. Some schools described using SSTs primarily as a procedural step to justify special education referrals, rather than as an opportunity for meaningful intervention, resulting in interventions that lack integrity. Furthermore, one school indicated that SST meetings were not conducted until March, highlighting delays and inconsistencies in the prereferral process and a lack of oversight to ensure implementation of these essential programs.

Participants indicated that Student Study Team (SST) forms and intervention records, including progress monitoring conducted by RITs, are currently managed using Google Sheets or stored within students' cumulative folders. These processes are established independently by each school, resulting in varied formats and an absence of standardized procedures for integrating data into the SIS. Additionally, schools utilize a range of data systems—including SWIFT—to collect intervention data; however, these systems

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similarly limit access to data beyond individual campuses. The inclusion of this information in student cumulative folders differs significantly from one school to another and is not reflected within the SIS. This lack of consistency in access to intervention data presents challenges in maintaining comprehensive and cohesive student records.

School psychologists and other assessors emphasized that the lack of standardized documentation practices across schools poses major challenges during the special education assessment process. When students move from one school to another within the district, assessors are often unable to access complete Student Study Team (SST) records and intervention histories. This gap in documentation makes it difficult to accurately review and evaluate a student's previous interventions and support strategies, which can impede the effectiveness and timeliness of assessments. As a result, continuity of support for students is disrupted, hindering both the identification of student needs and the provision of appropriate services.

A review of bullying and harassment incidents within the SIS discipline module revealed that the available data was incomplete. The records primarily focused on students identified as committing these acts, or offenders, rather than students who were subjected to bullying and harassment. This lack of comprehensive data made it difficult to identify and analyze student groups impacted by these behaviors, especially when considering factors such as race/ethnicity and disability status. As a result, efforts to understand the prevalence and patterns of victimization were significantly limited, impeding the ability to propose interventions to effectively and equitably target student groups who experience bullying or harassment.

The district maintains two offices to address bullying and harassment: the Constituent Services Office (CSO) and the Student Hearing and Placement Office. Although the Student Hearing and Placement Office and the CSO both handle bullying and harassment complaints, there is a lack of coordination between these entities. Responsibilities have been delineated such that the CSO addresses allegations involving adults or staff, while the Student Hearing and Placement Office manages student-related complaints. However, neither office has reported investigating any bullying or harassment complaints, nor are they aware of the number of complaints submitted, including those filed through the Uniform Complaint Procedure (UCP). Additionally, there is ambiguity regarding which office is responsible for UCP complaints involving students, as the CSO appears to be designated for these investigations.

Site-level staff reported informal approaches to addressing bullying, with some participants indicating that students who engage in bullying may be placed on safety plans. Although a district policy exists which details procedures for responding to bullying allegations, supporting victims and their mental health needs, and available trainings, discussions with both district and site-level personnel revealed a lack of awareness regarding these guidelines. Schools shared varied feedback about the Bully Prevention

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office: some benefited from assistance with severe incidents and received prevention activities, whereas others experienced cancellations of scheduled events and minimal engagement.

The review identified significant deficiencies in the district's systemic structures for addressing acts of bullying and harassment. Specifically, there is an evident lack of timely and adequate investigation or response to these incidents. Both central offices responsible for overseeing bullying and harassment cases have not conducted investigations, which strongly suggests that these acts are not being handled appropriately, despite the likelihood of their occurrence.

Furthermore, the lack of comprehensive data within the Student Information System (SIS) identifying victims of bullying and harassment highlights an absence of established policies, procedures, and oversight. While central office staff referenced the Guardian data system as a resource for tracking bullying and harassment incidents, no data from this system was provided, nor did site-level staff reference its use. This deficiency raises concerns regarding the district's duty of care, which requires school officials to protect students and staff from harm and ensure proper reporting of such incidents. In the absence of these mechanisms, schools may not be able to effectively fulfill their responsibilities to safeguard individuals impacted by bullying and harassment.

Although comprehensive data regarding students who were victims of bullying and harassment remains inadequate, baseline data has been reported to provide insight into the prevalence of such acts. It is important to note that the current data likely underrepresents the actual number of incidents.

The review was unable to establish data-driven outcomes pertaining to incidents of bullying and harassment, as well as referral mechanisms within the Multi-Tiered System of Supports (MTSS), including Coordination of Services Teams (COST) and Student Study Teams (SSTs). These areas currently lack sufficient data for meaningful analysis and will be subject to ongoing monitoring. Data-based outcomes may be developed in the future as improved information becomes available.

The Action Plan requirements are designed to build systems and capacity related to the implementation of the Multi-Tiered System of Supports (MTSS). These requirements focus on establishing general education referral and intervention mechanisms, as well as developing effective structures for identifying, investigating, and responding to acts of bullying and harassment within the district. By prioritizing these areas, the Action Plan aims to ensure that schools have the necessary tools and processes to support students who experience academic, behavioral, or social challenges, and to address incidents of bullying and harassment in a timely and comprehensive manner. This systematic approach is intended to promote consistency across schools, enhance the effectiveness of interventions, and safeguard the well-being of all students.

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To enhance the effective implementation of the Multi-Tiered System of Supports (MTSS), it is imperative for the district to develop clearly defined metrics that facilitate the identification of students experiencing academic, behavioral, social-emotional, or social difficulties. These metrics will provide a foundation for delivering timely and appropriate interventions tailored to each student's specific needs. The measures should directly enable schools to assess the effectiveness of their tiered supports as they relate to instructional programs and interventions, as well as student outcomes such as reduced disciplinary referrals and removals, decreased SST and special education referrals, increased redesignation rates for English Learners, and improved attendance.

Achieving consistency and equity across all schools requires the district to implement a series of essential measures aimed at standardizing practices. Foremost among these is the adoption of common assessments, which will provide a uniform approach to identifying student needs and monitoring their progress. By utilizing the same assessment tools district-wide, educators can ensure that every student is evaluated based on the same criteria, fostering equitable support and intervention strategies.

In addition to common assessments, the district must develop and use uniform forms and tools for documentation. Standardized documentation practices will streamline the process of recording student information, interventions, and outcomes, guaranteeing that all relevant data is consistently captured. This uniform approach not only enhances efficiency but also supports the seamless transfer of records between schools, reducing gaps in information when students move within the district.

The overarching goal of standardizing a model is to enable schools to build responsive systems that are sustainable, efficient, and equitable. By establishing practices that are scalable, the district ensures that schools can maintain equitable support for students even in the event of staff or resource reductions. Ultimately, the implementation of a uniform model facilitates equity and consistency, allowing schools to deliver high-quality interventions and supports to all students regardless of changing circumstances.

It is critical to require curriculum and training that equip staff with the knowledge and skills needed to effectively support students within the MTSS framework. Furthermore, the district must mandate the collection and maintenance of data within the Student Information System (SIS), including SST data. This will facilitate accurate tracking of interventions, outcomes, and overall program effectiveness, thereby supporting data-driven decision-making and continuous improvement.

The district must recognize the importance of supporting all students and staff, including those who are not part of proof-of-concept schools. Every school within the district is actively engaged in implementing the functions or intent of MTSS, which is to promptly identify and assist students who are experiencing academic, behavioral, or social-emotional difficulties.

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All schools must systematically identify the Tier supports accessible at each intervention level. This process requires a thorough evaluation of current interventions and supports designed to meet the needs of students experiencing difficulties. The distribution of support matrices, formulated by the central office and implemented in proof of concept schools, may facilitate this assessment.

In addition, schools must designate the level of development for each identified intervention or support. This step ensures that schools can evaluate the effectiveness and scope of their interventions, guide ongoing improvements and helping to ensure that students receive timely and appropriate assistance tailored to their needs.

The Action Plan mandates a comprehensive restructuring of the district's systems for identifying and addressing complaints of bullying and harassment. Central to this reorganization is the establishment of a unified central office department dedicated to overseeing all related processes.

This department will be responsible for utilizing reliable data to inform all decisions and actions, ensuring that responses to incidents are both timely and effective. Proactive prevention strategies and targeted efforts must be prioritized to reduce the occurrence of bullying and harassment across the district.

Furthermore, the district is required to establish comprehensive investigative protocols and corrective action procedures to be executed by both site and central level administrators, as well as mandating appropriate training. These initiatives are intended to ensure that instances of bullying or harassment are swiftly addressed, measures are implemented to prevent future occurrences, and remediation is provided to support students or staff members who have been impacted.

Baseline Performance

Bullying and Harassment Offenses

Discipline codes on bullying and harassment were reviewed to assess if certain student groups are more vulnerable. However, because most reports involved students as offenders, reliable baselines could not be established, preventing the establishment of data-based outcomes.

These data provide an estimate of the number of events occurring but is likely an underreporting. Discipline codes are recorded and maintained using either a local or state code. The local codes are for offenses that are alleged and either not verified or when the consequence does not result in an out-of-school suspension. The lack of victim data is concerning because schools must monitor and support students affected by these acts. Baselines are provided for both the number of cases and the students

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involved. In certain situations, multiple students participated as offenders, resulting in a higher student count than the total number of cases. When reporting baselines for student groups, only unique individuals are counted; however, these students may have been involved in more than one incident.

Baselines of Students who Committed Acts of Bullying or Harassment

- 761 incidents of bullying or harassment were reported in the discipline module, with 759 incidents reporting offender information
- 136 cases (17.9%) were reported with local codes, involving 153 students as “offender” with 114 (74.5%) for general education students and 39 (25.5%) for special education students
- 623 cases (82.1%) incidents were reported with state codes, involving 595 students with 68.4% of offenders were general education students and 31.6% for SWDs
- Black students made up 41.1% (n=245) of those disciplined, including 161 in general and 84 in special education

Baselines of Students who were Subjected to Acts of Bullying or Harassment

- Of the 761 cases of bullying and harassment in the discipline module, 97 students were identified as victims of these acts, representing 12.7% of all events
- 56 were general education students with 41 SWDs
- Black students represented 20.6% (n=21) of all bullying and harassment victims, with 52.4% (n=11) among general education and 47.6% (n=10) among special education students
- 62.9% of students who faced bullying and harassment had incidents documented with local codes, meaning that about two-thirds of complaints could not be validated and did not result in disciplinary actions

Data-Based Outcomes and Action Plan Requirements

Because there is insufficient data on victims of bullying and harassment, no targeted outcomes for specific student groups could be set. Instead, an outcome focused on improving data accuracy is proposed.

The Action Plan includes requirements for inclusion in the district’s implementation plan which aims to build systemic capacity for developing effective MTSS structures that promote uniform and equitable practices. The requirements promote unified and cohesive mechanisms with oversight and accountability for investigating and addressing instances of bullying and harassment.

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The Action Plan outlines specific requirements that must be integrated into the district's implementation strategy. The primary goal is to enhance systemic capacity by establishing effective Multi-Tiered System of Supports (MTSS) frameworks across schools. These frameworks are designed to ensure consistent and equitable practices that support all students.

The requirements focus on creating unified mechanisms that provide oversight and accountability for the investigation and resolution of bullying and harassment incidents. By promoting uniform procedures, complaints can be addressed with integrity and thoroughness, reinforcing equitable treatment and resolution for students involved.

Outcome #21: Accurate Reporting of Bullying and Harassment Incidents

By September 30, 2031, the District will improve accuracy of bullying and harassment data so that 95% of all reported allegations of such acts will include complete information of the event, parties involved (offender, victim, participant, witness) within the SIS system. Similarly, 95% of the cases that result in investigation (UCP or other) must adhere to corresponding timelines and have accurate records maintained centrally in electronic and physical (hardcopies) formats.

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Section 5. MTSS, SSTs, and Bullying and Harassment		
Required Actions	Goal(s)	Directives
5A.1 Update policies and procedures to ensure schools implement MTSS and identify students needing academic, behavioral, social-emotional, or attendance interventions within general education. Policies should require consistent use of referral processes like COST and SST (see Appendix A).	Ensure policies and procedures reflect and guide best practices and are aligned to state and federal laws and regulations.	1, 2, 3, 4, 5, 7, 8, 9, 20
5A.2 Develop a framework for a uniform MTSS model that clearly defines expectations for the following essential components: • Teaming structures • Screening and use of common assessments • Progress monitoring • Multi-level prevention system • Data-based decision making The framework should specify data metrics, set implementation standards, provide uniform documentation forms, and outline progress monitoring methods. Key metrics include but not limited to: Common assessments in academics including English Language Arts and Math • English language development (ELD) • Attendance • Behavior and discipline referrals • Social emotional referrals such as bullying • Interventions attempted, including reading intervention and progress monitoring	Establish systemic capacity and practices that ensure consistent and equitable practices that support all students, in particular Black students. Establish a reliable data system that documents, stores, and tracks MTSS data with the capacity to disaggregate data by race/ethnicity and disability.	1, 2, 3, 4, 5, 7, 8, 9, 10, 20

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• COST and SST referral data and fidelity of interventions attempted • SST referrals that result in special education referrals Specify standard tools and assessments, with limited options to promote equity and access. The framework should identify PBIS initiatives and mandate districtwide implementation, or at a minimum, limit options available to schools ensure equitable implementation and access The framework should specify Tier 1, Tier 2, and Tier 3 expectations, supports, and interventions, and link them to the departments responsible for resources, training, and oversight. The framework should provide clear procedural steps for data collection, entry, maintenance, and reporting in the SIS or any alternative system if SIS is insufficient. Assess MTSS effectiveness using data metrics such as referral rates, academic progress, EL student redesignation rates, attendance/SARB reductions, and fewer disciplinary referrals; evaluations should rely on these metrics, not fidelity assessments. Add implementation fidelity measures and accountability procedures for schools needing support or remediation.		
5A.3 Schools must create site-level inventories of available MTSS expectations, supports, and interventions for Tiers 1, 2, and 3, specifying whether each is fully implemented, partially implemented, or in development. Schools should create inventories of expectations, supports, and interventions for all Tiers and ensure staff and parents can access them both on-site and online.	Establish systemic capacity and practices that ensure consistent and equitable practices that support all students, in particular Black students.	1, 2, 3, 4, 5, 7, 8, 9, 20, 22

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The inventories will be collected and reviewed with the school during the IM's Annual Improvement Walks, as outlined in Section 7.		
5A.4 Create uniform data governance procedures by using a single system—preferably Infinite Campus—to capture SST data, support MTSS implementation, and track both general education and special education referrals.	Establish a reliable data system that documents, stores, and tracks COST and SST data with the capacity to disaggregate data by race/ethnicity and disability.	21
5A.5 Update and review policies, procedures, and practices to ensure schools effectively prevent, investigate, and respond to bullying and harassment (See Appendix A).	Ensure policies and procedures reflect and guide best practices and are aligned to state and federal laws and regulations.	6, 17
5A.6 Create a consistent process for reporting, investigating, and addressing bullying and harassment at both site and central office levels. Develop a manual with forms and procedures to help administrators investigate incidents, document findings, take appropriate disciplinary action, and provide mental health support for victims. The manual should cover laws protecting students, staff, and community members from bullying and harassment, provide clear definitions and examples of these behaviors, and explain protected classes. Provide clear criteria distinguishing site-level investigations from those requiring central office action, like Uniform Complaint Procedure (UCP) investigations.	Ensure policies and procedures reflect and guide best practices and are aligned to state and federal laws and regulations. Establish systemic capacity and practices for investigating and addressing instances of bullying and harassment in	1, 2, 6, 21

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Also, set up a reporting system where schools submit incidents and investigation reports to a central office for review and assistance. The manual should provide clear procedures for SIS data collection, entry, and reporting. The central office shall review monthly data to identify patterns and provide relevant training and support to schools.	a unified and cohesive manner. Establish a reliable data system that documents, stores, and tracks bullying data, with the capacity to disaggregate data by race/ethnicity and disability,	
5A.7 Create and implement professional development to meet new requirements and support the Action Plan's goals for improving MTTS, ensuring effective general education interventions to reduce overidentification of students, especially Black students, in special education. Training should cover framework areas including screening, assessments, tiered supports, progress monitoring, referral procedures, data management, and data-based decision making. It should also address laws on bullying and harassment, methods for investigation, distinguishing site and central responses, and relevant data practices. The training program must provide a schedule for priority staff such as school administrators, psychologists, special education teachers, case managers, related service providers, and other relevant personnel.	Establish systemic capacity and practices for investigating and addressing instances of bullying and harassment in a unified and cohesive manner. Establish a reliable data system that documents, stores, and tracks bullying data, with the capacity to disaggregate data by race/ethnicity and disability.	1, 2, 3, 4, 5, 6, 7, 8, 9, 17, 20, 21

Section 6. Recruitment and Retention

This section outlines the district's ongoing initiatives to enhance staff diversity, particularly among underrepresented groups, and to achieve staffing ratios of 500:1 for both school psychologists and social workers. As part of these efforts, human resources data were systematically collected and analyzed to assess overall staffing levels and to develop a comprehensive diversity profile by position and race/ethnicity. These findings inform the district's strategies for recruitment and retention, ensuring that goals for both staff diversity and appropriate student support ratios are addressed in a data-driven manner.

The review of current staffing demographics indicates that many positions within the district are primarily occupied by White staff members. Social workers, however, stand out as the exception, with this group reflecting a higher degree of diversity compared to other staff positions.

Analysis of staffing ratios, based on student enrollment figures for the 2024-25 school year, shows that the ratio of school psychologists to students is 675:1, while the ratio of social workers to students is 653:1. Looking ahead to the most current 2025-26 enrollment numbers, these ratios will improve, with school psychologists serving at a ratio of 533:1 and social workers at 512:1.

Despite current financial limitations, the district does not anticipate a reduction in the number of school psychologist or social worker positions. To ensure continued alignment with student needs and organizational goals, these support staff ratios will be recalculated and reported on an annual basis.

The district continues to focus on increasing workforce diversity by implementing targeted recruitment strategies for both external applicants and current staff. These recruitment activities are designed to attract a broader range of candidates and encourage the advancement of underrepresented groups within the organization. However, the district currently has limited data to evaluate the impact and effectiveness of these initiatives.

In addition to recruitment efforts, the district gathers retention data when employees leave the organization for various reasons. While this data collection is an important step toward understanding workforce dynamics, there has not been sufficient analysis of the underlying organizational factors, such as working conditions, that may influence staff departures. Addressing these issues through targeted interventions could further support the district's goals for a diverse and stable workforce.

To better serve students designated as English learners, the district must prioritize increasing the number of bilingual staff, with a particular focus on related service providers involved in the special education assessment process. It is essential that these

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professionals be strategically assigned to maximize their bilingual skills when conducting student assessments. By leveraging the language abilities of these staff members, the district can ensure more accurate and equitable evaluations for students whose primary language is not English. This approach supports both the effectiveness of the special education process and the district's broader goals for inclusive and culturally responsive services.

Staff members, including related service providers, have identified significant challenges in the district's hiring and onboarding processes. A primary concern is the extended processing times and limited responsiveness from the human resources department. Employees reported that the transition from accepting a job offer to completing onboarding procedures often takes several months. This prolonged timeline has resulted in numerous candidates, who initially accepted positions, ultimately seeking employment elsewhere due to the delays. Additionally, staff expressed concerns about the delays in hiring and onboarding interns. These issues further contribute to difficulties in filling vacant positions and maintaining adequate staffing levels within the district.

To improve the efficiency of the district's human resources processes and ensure a more timely hiring experience, the Action Plan establishes a structured approach focused on streamlining each stage of recruitment and onboarding. The process will involve a detailed breakdown of the individual steps in the hiring workflow, allowing for the identification of bottlenecks and opportunities for improvement.

For each step, specific timelines or benchmarks will be determined to expedite the onboarding of new employees. These benchmarks will be carefully calculated and supported by relevant data, enabling the district to monitor progress and make necessary adjustments to ensure hiring remains prompt and efficient.

In addition to process efficiency, the plan calls for systematic data collection related to recruitment activities. This will include tracking the number of candidates who pursue employment with the district as a direct result of participation in recruitment events. Furthermore, data on the timeliness of the hiring process for these candidates will be gathered, providing insight into the effectiveness of recruitment strategies and the overall HR process.

To further support workforce stability and address staff departures, the district must conduct a thorough analysis of retention data. This analysis should focus on identifying recurring patterns that are linked to organizational factors influencing employee decisions to leave. Among these factors, variables such as caseload versus workload and the presence of hostile work environments require particular attention. By investigating these areas in detail, the district can identify problematic conditions that impact staff retention.

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Once these problem areas have been identified, targeted strategies should be developed to investigate and remediate them. These strategies may involve adjusting workloads, improving workplace culture, and implementing interventions designed to create a more supportive and positive environment. Through this approach, the district can proactively address challenges, enhance employee satisfaction, and strengthen workforce continuity.

While data-driven outcomes for increasing workforce diversity have not yet been defined, it is important for the district to establish specific targets to guide recruitment activities and measure progress. By setting clear goals, the district can more effectively assess the impact of its efforts to diversify the workforce.

The baselines provided below are intended to illustrate the current diversity within positions that support students with disabilities and deliver special education services. These benchmarks will serve as reference points for evaluating future recruitment and retention initiatives aimed at enhancing workforce diversity.

Baseline Performance

Baselines of School Psychologist

- The district employs a total of 60 school psychologists
- The majority (n=38 or 63.3%) of school psychologists are White
- 13 or 21.7% are Hispanic
- Asian (8.3%) and Black (6.7%) school psychologists constitute the least represented groups

Baselines of Social Workers

- Social workers fall under two employee classifications: School Social Worker and Clinician Psychologist/Social Worker and report to different departments
- The district employs 53 school social workers
- White employees make up 43.4% of all school social workers (n=23)
- 22 or 41.5% are Hispanic
- Black and Asian/Pacific Islander school social workers constitute 7.6% and 7.5% of all employees, respectively

Baselines of Clinician Psychologist/Social Workers

- A total of 9 clinical psychologists and social workers are employed
- Black and White clinicians are equally represented in this group, with three Black (33.3%) and three White (33.3%) clinical psychologists and social workers

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- The remaining staff consists of two Hispanic and one Asian clinician

Speech-Language Pathologists (SLPs)

- The total number of SLPs employed is 45
- The majority (n=31 or 68.9%) are White SLPs
- Hispanic and Asian SLPs each have 5 employees, representing 11.1% of the unit, respectively
- Black and Pacific Islander SLPs each have 2 employees, representing 4.4% of the unit, respectively

Occupational Therapists

- A total of 13 occupational therapists are employed
- White OTs represent the majority (n=9 or 69.2%) of the unit
- Asian OTs represent 3 or 23.1% of the unit
- The unit has one Black OT (7.7%)

Baselines of RSP Teachers

- The district has a total of 150 RSP teachers
- White teachers represent about half (n=74 or 49.3%) of RSP teacher
- Black (n=21) and Hispanic (n=21) teachers each represent 14.0% of all RSP teachers
- Asian teachers (n=20) represent 13.3% of all RSP teachers
- Pacific Islander (n=12) teachers represent 7.3% of all RSP teachers
- American Indian/Alaskan Native teachers (n=3) represent 2% of all RSP teachers

Baselines of Special Education (SDC) Teachers

- The district employs 193 SDC teachers
- White teachers represent more than half of all SDC teachers (n=114, or 59.1%)
- Hispanic teachers (n=22) represent 11.4% of SDC teachers
- Black teachers (n=21) represent 10.9% of SDC teachers
- Asian teachers (n=19) represent 9.8% of all SDC teachers
- Pacific Islander teachers (n=14) represent 7.3% of SDC teachers
- American Indian/Alaskan Native teachers (n=3) represent 1.6% of SDC teachers

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Baselines of Counselors (Academic programming) assigned to Middle and High Schools

- The district employs 57 counselors
- White counselors (n=20) represent 35.1% of this group
- Hispanic counselors (n=17) represent 29.8% of this group
- Asian counselors (n=21) represent 21.1% of this group
- Black counselors (n=7) represent 12.3% of this group
- American Indian/Alaskan Native counselors (n=1) represent 1.8% of this group

Baselines of Site Administrators including Principals and Vice Principals

- The district employs 115 school administrators including principals and vice principals
- The majority are White (n=48) accounting for 41.7% of site administrators
- Hispanic site administrators (n=26) represent 22.6% of this group
- Black site administrators (n=21) represent 18.3% of this group
- Asian site administrators (n=11) represent 9.6% of this group
- American Indian/Alaskan Native (n=3), Filipino (n=3), and Native Hawaiian/Other Pacific Islander (n=3) site administrators each represent 2.6% of this group

The following Action Plan requirements must be included in the district's Implementation Plan.

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Section 6. Recruitment and Retention		
Required Actions	Goal(s)	Directives
6A.1 Review and analyze the current hiring processes for special education teachers, staff, and related service providers. This analysis should detail the timeline from the initial interview to the onboarding of new hires, and identify significant steps in the hiring process. Benchmarks should be established for each step, outlining expected timelines to ensure compliance. Additionally, include expedited procedures for shortage areas, such as speech and language therapists.	Establish systemic capacity and practices that substantially reduce the onboarding time for new employees.	15, 16, 18
6A.2 Develop and present an annual plan for the recruitment and retention of special education staff. This plan must be updated yearly and encompass teachers, related service providers, administrators, and behavioral and mental health support staff. The plan should include a schedule of recruitment activities, specify target groups, and detail planning or promotional actions. Data collection is required for each event, capturing the number of applicants and new hires, their positions, demographic information, and the time taken to hire and onboard candidates. The plan should also establish targets to increase workforce diversity, particularly for underrepresented groups, including bilingual personnel.	Ensure policies and procedures reflect and guide best practices and are aligned to state and federal laws and regulations. Establish a reliable data system that documents, stores, and tracks recruitment and retention data, with the capacity to disaggregate data by race/ethnicity and disability.	15, 16, 18, 21
6A.3 Continue to refine and update recruitment plans tied to university partnerships, community collaborations, and career ladder programs. These efforts will include the development and implementation of strategies to accelerate the hiring and onboarding process for interns who serve within	Establish systemic capacity and practices that substantially increase recruitment activities and	15, 16, 18, 21

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the district, as well as for current staff transitioning to new roles as part of the career ladder program. To evaluate the effectiveness of recruitment activities, data will be systematically collected for each event. This data should capture the total number of applicants and new hires, details regarding the specific positions filled, demographic information of each candidate, and the timeframe required to hire and onboard individuals.	reduce the onboarding time for new employees. Establish a reliable data system that documents, stores, and tracks recruitment and retention data, with the capacity to disaggregate data by race/ethnicity and disability.	
6A.4 Develop comprehensive methods for collecting and analyzing employee exit data. The focus will be on identifying clear and specific reasons for employees leaving the district. The district will establish procedures to systematically gather exit data from departing employees. Analysis will be conducted to detect patterns and trends in the reasons for exits, with particular attention to work conditions, including hostile environments. Reasons for leaving that are not related to retirement, relocation, or family issues will be carefully reviewed. When patterns emerge that suggest problematic work conditions, the district will implement strategies or actions to investigate and address these concerns. Appropriate interventions will be developed to improve working conditions and resolve identified issues. A comprehensive report summarizing exit data findings and responsive strategies will be compiled and submitted after the end of each school year throughout the compliance period.	Establish a reliable data system that documents, stores, and tracks employee exit data, with the capacity to disaggregate data by race/ethnicity and disability.	15, 16, 18, 21

Section 7. Data Governance and Accountability

Effective implementation of the Action Plan's reform efforts depends on strengthening data governance and accountability throughout the district. For the district to disengage from court oversight, it must demonstrate it has robust systems capable of promptly detecting instances of noncompliance or inadequate performance. These systems must not only identify issues but also ensure that noncompliance is addressed immediately, the problematic behavior is discontinued, and measures are put in place to prevent recurrence. Remediation should also effectively mitigate any negative or harmful impacts experienced by affected parties.

Achieving reliable identification of noncompliance requires the district to maintain high-quality data systems that consistently monitor programs and overall performance. These data systems must be complemented by responsive accountability mechanisms that make certain all schools and staff comply with established policies and procedures. Adherence to these standards should cultivate best practices and promote the well-being of students across the district.

When noncompliance is detected, the district must take corrective action, which may include targeted capacity building, increased support, and, when necessary, the use of progressive discipline. These steps are essential to ensure continuous improvement and sustained alignment with the district's reform objectives.

Data governance within the district hinges on the establishment of uniform procedures for data collection. All schools are required to enter complete and accurate data, ensuring consistency and reliability across the district. The Student Information System (SIS) serves as the primary data management platform; schools should utilize the SIS instead of relying on separate, site-level data mechanisms that might supplement or replace the official system.

To support timely and effective delivery of student supports and services, data must be accessible across all programs. This accessibility is essential for a comprehensive understanding of each student's needs and progress. Furthermore, robust data governance enhances transparency by maintaining consistently accurate records that fully capture both school practices and student experiences.

Accessible and trustworthy data must be used to inform decision-making processes and to evaluate the effectiveness of district programs. By relying on objective data, the district can improve accountability in a manner that is both fair and equitable, ensuring that all students benefit from best practices and that program outcomes are thoroughly assessed.

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Central and site level administrators are required to possess a thorough understanding of student outcomes and the performance of the programs under their supervision. For example, it is essential that administrators responsible for overseeing behavior hearings and addressing bullying complaints maintain up-to-date knowledge on the number of cases reviewed, the outcomes of investigations or hearings, and any trends that may indicate noncompliance or discriminatory practices. By closely monitoring performance, administrators can promptly identify and address potential issues, ensuring that all programs are implemented equitably and in accordance with district policies and procedures.

Data governance must be embedded within all relevant district policies and procedures to ensure consistent and effective management of data. Administrative Regulations (ARs) and procedural manuals should provide clear, step-by-step guidance on the processes of collecting, maintaining, and reporting data. This structured approach is essential for maintaining data integrity and supporting district-wide initiatives.

To enhance accountability and promote continuous improvement, periodic reports should be generated and distributed to site administrators. These reports must include analyses of data patterns and trends, enabling administrators to identify potential issues or areas of concern. By recognizing these patterns, the district can facilitate timely remediation of problematic practices and offer targeted staff support and additional training when necessary.

The Action Plan requires the district to establish comprehensive policies and procedures specifically focused on data governance. This may involve creating new, dedicated policies or integrating essential guidance and requirements into existing, broader district policies. A key aspect of this initiative is to move away from a culture in which data management and oversight are confined to individual departments. Instead, the district must foster a culture of shared data ownership. This approach emphasizes the importance of broad access to data, enabling programs to operate more effectively and ensuring that both schools and staff are held accountable for their performance. By promoting collective responsibility for data, the district can better support its programs and drive continuous improvement across all levels.

Strengthening capacity in data governance is a critical component for ensuring the effectiveness of district-wide data management and accountability. To achieve this, the district must identify and assign a dedicated individual or department with the responsibility to oversee the quality and integrity of all data and data systems. By centralizing oversight, the district can better coordinate efforts, address issues proactively, and promote a culture of accuracy and transparency throughout all levels of the organization.

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Annual Improvement Walks will be conducted at the start of each school year, with site visits scheduled throughout the fall. These walks are designed to support and strengthen data governance and accountability by providing each school with a comprehensive performance profile. The profiles will focus on areas directly related to the Action Plan and will include data-driven outcomes such as disciplinary removals, rates of special education identification, timely completion of IEPs, Least Restrictive Environment (LRE) placement rates, and progress in implementing referral processes and Multi-Tiered System of Supports (MTSS).

The primary goal of the Annual Improvement Walks is to equip site administrators and leadership teams with end-of-year performance data. During these walks, administrators will have the opportunity to review and discuss the reasons and concerns behind their school's performance. These discussions aim to uncover site-specific challenges and barriers that may impact outcomes, provide insights into factors contributing to progress, and facilitate a deeper understanding of each school's unique context.

Furthermore, the Annual Improvement Walks serve as a forum for site teams to share their plans for building greater capacity in implementing best practices. By engaging in open dialogue about performance data, challenges, and capacity-building strategies, the district and school leaders can collaboratively identify areas for targeted support and professional development, reinforcing the district's commitment to continuous improvement and accountability.

Annual Improvement Walks are established as a data-driven strategy to strengthen systemic structures, enhance organizational capacity, and foster site-based solutions within the district. This process, while intended as a stand-alone mechanism, may also be incorporated into existing frameworks such as the School Plan for Student Achievement (SPSA), ensuring alignment with ongoing initiatives.

Each school site will be responsible for setting annual improvement benchmarks. By implementing targeted goals at the individual school level, the intent is to stimulate improvement within each unit, which will contribute to broader progress across the entire district. The Annual Improvement Walks serve as a key driver for advancing program development and promoting district-wide growth through focused, site-level action.

To ensure meaningful parent and community feedback, the OIM will establish a Parent Advisory group composed of 30 parents of students with disabilities. This group will be representative of the district's diversity and will serve in an advisory capacity to the Independent Monitor, providing input on the district's efforts to implement its Implementation Plan.

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The Parent Advisory group will meet every other month with all relevant Parties, including the Office of the Independent Monitor (OIM), Plaintiff's Counsel, Plaintiff's (BPSB), and district representatives. These regular meetings are intended to facilitate ongoing dialogue, share updates, and gather feedback regarding the district's progress and implementation efforts.

In addition to the advisory group meetings, the Independent Monitor will host an annual hearing. Parents, staff, and community members will be invited to attend and share their concerns and experiences related to the areas covered by the Action Plan, as well as the progress of the district's Implementation Plan. This hearing will provide a public forum for stakeholders to voice their perspectives and contribute to the district's ongoing improvement efforts.

The following Action Plan requirements must be included in the district's implementation plan. There are no data-based outcomes associated with this section.

It is important to note that this section does not establish data-based outcomes; its purpose is to ensure that the procedural elements of the Action Plan are embedded within the district's implementation framework, as seen below.

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Section 7 Data Governance and Accountability		
Required Actions	Goal(s)	Directives
7A.1 The district will develop, review, or revise policies, procedures, and practices in line with established best practices to ensure that all schools create and implement standardized methods for data collection, maintenance, and reporting (See Appendix A). These procedures must be included within Administrative Regulations (ARs). ARs will provide clear, step-by-step instructions for entering, maintaining, and reporting data, ensuring alignment with state and federal requirements as appropriate.	Ensure policies and procedures reflect and guide best practices and are aligned to state and federal laws and regulations.	21
7A.2 Appoint a point person to manage all data collection, maintenance, and reporting for this Action Plan. This person will review, clean (e.g., remove duplicates, reconcile inaccuracies), and format data from sources like Infinite Campus and SEIS before submitting to the IM. They will also coordinate data audits using OIM methods and oversee reconciliation at school sites or departments.	Establish systemic capacity and practices for collecting, maintaining, and reporting data.	21
7A.3 Develop comprehensive policies and standard practice procedures for data governance and program monitoring. The district is required to generate monthly data extracts for submission to the OIM and use these extracts to monitor school compliance with established data collection and maintenance protocols. Additionally, a review and remediation mechanism must be implemented to ensure the accuracy and integrity of school-maintained data.	Establish systemic capacity and practices for collecting, maintaining, and reporting data.	21
7A.4 Schools will participate in Annual Improvement Walks led by the Office of Independent Monitoring (OIM). At the start of each school year, schools will receive end-of-year baseline data from previous years. This data will be	Establish systemic capacity and practices for continuous improvement and accountability.	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 12, 13, 20, 21, 22

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disaggregated by race/ethnicity and disability status where appropriate and will cover the following areas: • Special education enrollment profiles categorized by race/ethnicity and eligibility categories • Least Restrictive Environment (LRE) data, reported by categories: 80% or more in general education, 41-79% in general education, and 40% or less in general education • Discipline data, including out-of-school and in-school suspensions, as well as "Other Means of Correction" (discipline referrals that led to alternatives to suspension) • Data on overdue Individualized Education Program (IEP) meetings for initials, annual reviews, and reevaluations • Parent participation rates at IEP meetings • The number of students with Behavior Intervention Plans (BIPs) and counseling services included in their IEPs • MTSS inventory of Tiered supports and interventions implemented at each site Schools are required to identify improvement targets for each of these data areas, focusing especially on student groups that exhibit high rates or are overrepresented, with particular attention to SWDs and Black students. Schools will specify the status of Tiered supports and interventions available at their school, indicating whether each support is fully implemented, partially implemented, in development, or in planning stages. During the annual Independent Monitoring (IM) visits, schools will share their established improvement targets and provide updates on progress related to the implementation and development of Tiered supports and interventions.		
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Schools must also communicate the strategies they are undertaking to meet performance outcome goals and Action Plan requirements. This includes efforts to reduce suspensions and increase Least Restrictive Environment (LRE) metrics, specifically the amount of time students with disabilities spend in general education settings.		
7A.5 To support oversight of the District's progress with its Implementation Plan and the Office of Independent Monitoring's (OIM) monitoring efforts, a Parent Advisory group will be established. This group will convene every other month to review and provide input regarding the District's activities and monitoring processes. The Parent Advisory group will be composed of up to 30 members. Membership will reflect the diversity of the district and its special education population. Representation will include a range of student ages and grades, eligibility categories (high incidence and low incidence), and race/ethnicity. The Office of Independent Monitoring (OIM), in collaboration with the BPSB, will lead the selection process and conduct interviews for group membership.	Facilitate ongoing dialogue, share updates, and gather feedback regarding the district's progress and implementation efforts.	22
7A.6 The IM will conduct an annual hearing each spring, inviting families of students with disabilities and community members to share their concerns and experiences regarding performance outcomes and Action Plan requirements, as well as to discuss progress on the District's Implementation Plan. The aim of the annual hearing is to foster transparent communication, gather valuable feedback, and ensure that the voices of families and the community are considered in the ongoing improvement efforts.	Provide a public forum for stakeholders to voice their perspectives and contribute to the district's ongoing improvement efforts.	19, 22