

# Introduction to *Comprehensive Coordinated Early Intervening Services*

Individuals with Disabilities Education Act - 34 CFR § 300.646 (d)

WI Federal Funding Conference  
February 2023



Formula funds under IDEA are awarded on a non-competitive basis for programs and services to students with disabilities.

## **Preschool (PS)**

Provides funding for special education services to children ages 3 to 5.

## **Flow-through (FT)**

Provides funding for special education services to students ages 3 to 21.

## **IDEA Part B Formula Grants**

# Identifications under IDEA

LEAs that have been identified by DPI with significant racial disproportionality are required to set aside and expend 15% of their IDEA Part B formula allocation on Comprehensive Coordinated Early Intervening Services (CCEIS)-funded activities.

34 CFR § 300.646 (d)

## Identification History

Significant Disproportionality identifications were introduced with IDEA's reauthorization in 2004. Under 34 CFR § 300.646(b), states could choose a methodology and had flexibility in applying calculations.

In 2013, the US Government Accountability Office (GAO) released a report that was very critical of how states were complying with the IDEA regulations, basically stating that the spirit of the law was not being implemented.

# Significant Racial Disproportionality

When a student, based on race, is more than **TWICE AS LIKELY** as their peers to be...

Identified for special education - generally	Identified with a specific disability category (i.e., EBD)	Disciplined	Placed in a more restrictive environment
86U6L9  λ	(!6" EBD) c9r6B0λ		6UAILOUW6UΓ

34 CFR §§ 300.646-647

## Identification History

Based on the GAO report and OSEP's own monitoring, updated regulations were proposed to address the inconsistencies across the country. The final regulations took effect in January 2017.

Due to the significant regulation changes made to the calculation requirements, States were allowed a grace period (up to July 2020) to update their own systems.

# Identification Trend

Wisconsin's last year under the former calculation was FY 2018-2019.

The new criteria was applied and impacted LEAs beginning in FY 2019-2020.

2018-2019	2019-2020	2020-2021	2021-2022
6 LEAs	57 LEAs	57 LEAs	62 LEAs
\$1,486,782 Required	\$15,252,270 Required	\$15,737,631 Required	\$19,983,192 Required

# Identification Trend

In FY 2022-2023, the number of identified LEAs dropped from 62 to 53.

The identified LEAs generated a new required set-aside amount of \$15,120,622 based on FY 2022-2023 IDEA formula allocations.

However, those same LEAs carried over \$7,578,635 in unspent CCEIS funds from the prior year. These carryover funds must be expended by September 30, 2023.

## Clarification Provided on CEIS / CCEIS

Prior to the revised regulations, the use of the 15% set-aside was exactly the same for voluntary LEAs and required LEAs; restricted to:

- ❖ Students *without* disabilities
- ❖ Academic or Behavioral Interventions (above the core)
- ❖ Kindergarten – Grade 12

Identified LEAs found it very difficult to use their required “CEIS” set-aside to address and improve practice.

## Clarification Provided on CEIS / CCEIS

With the release of the revised regulations, OSEP clarified that the required 15% set-aside for identified LEAs was Comprehensive Coordinated Early Intervening Services (CCEIS) and the funds could be used to benefit:

- ❖ All Students
- ❖ No Limitation on Activities (can include universal)
- ❖ All ages 3 to 21

# Clarification Provided on CEIS / CCEIS

**With the flexibility, however, came the caveat:**

- ❖ CCEIS expenditures must be used to address factors the LEA identifies as contributing to the significant disproportionality (determined through a root cause analysis).
- ❖ The funds should be used “particularly, but not exclusively” for students in the groups that were significantly over identified.

34 CFR § 300.646 (d)(1)(ii-iii) and § 300.646 (d)(2)

## Responsibility of Identified LEAs

- 1. Conduct a Root Cause Analysis (Needs Assessment).**
- 2. Based on the results, identify the Factors (reasons) for the significant racial disproportionality.**
- 3. Select evidence-based improvement strategies that will have impact on the affected student groups.**
- 4. Develop a plan to implement the strategies and establish long-term improvement goals.**

# Continuous Improvement Plan (CIP)

## Alignment to the Continuous Improvement Process Criteria and Rubric

- ❖ Start with Key on Page 6
- ❖ Can use own template or Data Inquiry Journal for CIP
- ❖ Federal Identifications webpage
- ❖ Continuous Improvement resources



Continuous Improvement Process  
Criteria and Rubric

## Root Cause Analysis

*includes  
"Needs Assessment"*

### What is it?

- ❖ Needs assessment, data inquiry/adults practices inquiry that determines the reason (root cause) of the racial disproportionality.

### Who conducts it?

- ❖ LEA or school leadership team.

### How often should it be done?

- ❖ Minimum of annually to meet requirement.

# Root Cause Analysis

**A continuous improvement plan cannot be created without conducting a root cause analysis / comprehensive needs assessment.**

- ❖ The root cause analysis must address the Significant Disproportionality identifications.
- ❖ Costs of conducting a root cause analysis / comprehensive needs assessment and costs associated with establishing a continuous improvement plan can be funded with CCEIS.

## Continuous Improvement Performance Data Report (CIPR)

- ❖ Housed within WISEgrants.
- ❖ Displays IDEA LEA-level and ESSA school-level identifications.
- ❖ LEAs identified with significant racial disproportionality have either ESSA-identified “CSI,” “ATSI” or “TSI” schools with similar student groups.



# IDEA – LEA Identifications

## IDEA - LEA Identifications

IDEA Determination	Number of Years in this Category
Needs assistance in implementing the requirements of the IDEA	2

Racial Disproportionality in Special Education Identification, Discipline, and/or Placement	Student Groups	Number of Years in this Category
Racial disproportionality in specific disability categories.	Emotional Behavioral Disability: Black - African American	1
Racial disproportionality in specific disability categories.	Intellectual Disability: Black - African American	1
Significant disproportionality in discipline.	Black - African American	2
Significant disproportionality in discipline.	Hispanic	1
Significant disproportionality in discipline.	Two or More Races	1

### Schools Identified for Additional Targeted Supports and Interventions (ATSI)

School Code	School Name	ATSI Student Group(s)	Cohort Name	Cohort Year	Title I School Served
0492		<ul style="list-style-type: none"> <li>Black - African American</li> <li>Hispanic</li> <li>Students with Disabilities</li> </ul>	ATSI Cohort FY 2018-2019	1	No
0134		Black - African American	ATSI Cohort FY 2018-2019	1	Yes

### Schools Identified for Targeted Supports and Interventions (TSI)

School Code	School Name	TSI Student Group(s)	Consecutive TSI Years	Title I School Served
0491		<ul style="list-style-type: none"> <li>Black - African American</li> <li>Hispanic</li> <li>Students with Disabilities</li> </ul>	1	No
0118		<ul style="list-style-type: none"> <li>Black - African American</li> <li>Students with Disabilities</li> </ul>	1	Yes
0492		English Learners (EL)	1	No
0130		Black - African American	1	Yes
0134		<ul style="list-style-type: none"> <li>Hispanic</li> <li>Students with Disabilities</li> </ul>	1	Yes
0111		Hispanic	1	Yes

## Factors

### What are they?

- ❖ Root Cause FACTORS are the reason for the disproportionality identification as determined by the data inquiry.

### What should be avoided?

- ❖ Listing areas of disproportionality or student-based deficits instead of root cause factors.

\*\*Distinguishing Differences from Disability: The Common Causes of Racial/Ethnic Disproportionality in Special Education

## Root Cause / Factors

The factors contributing to the significant disproportionality may include:

- ❖ A lack of access to scientifically based instruction;
- ❖ Economic, cultural, or linguistic barriers to appropriate identification or placement in particular educational settings;
- ❖ Inappropriate use of disciplinary removals;
- ❖ Lack of access to appropriate diagnostic screenings;
- ❖ Policies, practices, or procedures that contribute to the significant disproportionality.

(34 CFR § 300.646 (d)(1)(ii))

Root Cause FACTORS	RATING	RATIONALE
Lack of effective MLSS behavior supports and staff training on trauma informed care impact all students, and impact {Black} students disproportionately, causing gaps.	Excellent	Root cause analysis uses student outcome and adult practice data, addresses target population.
Despite many years of implementation of Positive Behavior Interventions and Supports and various professional development opportunities, systemic delivery of school-wide practices lack consistency and rigor.	Good	Does not directly address target population.
Students arrive in our district already identified and not knowing how to act at school.	Poor	Blame is placed on the students/families.

Area of Significant Disproportionality: Discipline

## Evidence-Based Improvement Strategies

### What are they?

- ❖ Strategies the team determines will address their root cause factors and their target populations.

### Where do we get them?

- ❖ DPI support, TA Network/CESA supports, district leadership teams.

### What should be avoided?

- ❖ Listing all universal strategies without “enhancers” for target population, not having strategies connected to root cause factors.

**Area of Significant Disproportionality: Black, SLD**  
**Root Cause Factor: Teachers lack culturally-responsive instructional practices**

STRATEGY	RATING	RATIONALE
Hiring additional reading interventionists with training in culturally responsive reading practices.	Excellent	Strategy is related to root cause factor, addresses target population.
Hiring reading interventionist(s).	Good	Only partially addresses root cause factor and does not specify target population.
Hiring behavior interventionist(s).	Poor	Does not appear to be related to the factor or identified student groups.

## CCEIS Funding – Flexibility in Action

As long as the cost addresses the results of the LEA’s root cause analysis (and is allowed under the Federal Uniform Grant Guidance (2 CFR §200)) – it can be for services provided *outside of school*.

- ❖ Private Child Care
- ❖ Head Start
- ❖ Feeder Schools
- ❖ Mental Health Services

## Factor

**Through their root cause analysis, Snow Day School District discovered that three elementary schools made significantly more referrals of Black students to special education than any other schools.**

**These same three schools were identified as TSI under ESSA for Black students and Students with Disabilities.**

**Meetings with the three schools led to a hypothesis that young students entering school were under prepared due to a lack of best practice at the Early Childhood level.**

## Impacting Early Childhood

If the key is earlier prevention, then CCEIS funds can be used to invest in Early Childhood multi-level systems of support through partnerships with Community Approach 4K, Private Child Care Centers and Head Start.

- ❖ **Determine who should be a part of the child development team at the local level best suited to make this happen.**
- ❖ **Focus on the centers in which the elementary school students are attending.**

## UNIVERSAL SUPPORTS

### Collaborative professional development learning around:

- ❖ Developmentally Appropriate Practices and Environments for children in pre-K and early childhood programs.
- ❖ Social and Emotional development such as a Pyramid Model, Second Step and Conscious Discipline.
- ❖ Culturally and linguistically responsive instructional practices.
- ❖ Family Engagement.

### Expenditures:

- ❖ Position dedicated to Early Childhood – Disproportionality (such as a Social Worker who can be a coordinator / coach)
- ❖ Training / Professional Development / Collaboration

## TARGETED SUPPORTS

### Leverage support by:

- ❖ Paying for staff in private child care centers and Head Start to participate in shared training opportunities.
- ❖ Provide coaching / mentoring onsite at the private child care centers and Head Start to implement practices in the students' environment.
- ❖ Children removed from early childhood centers can be referred to the LEA for family transition services to prepare for entry into school.

### Expenditures:

- ❖ Stipends
- ❖ Mileage
- ❖ Coaches
- ❖ Mentors
- ❖ Materials
- ❖ Collaboration

## INTENSIVE SUPPORTS

### Most likely young children with IEPs:

- ❖ Support specific one-on-one coaching / child specific services in private child care center or Head Start.
- ❖ Support could be for staff and families.

### Expenditures:

- ❖ Staff time
- ❖ Mental Health contract
- ❖ Mileage
- ❖ Coaching
- ❖ Materials
- ❖ Collaboration

## Early Childhood – Disproportionality

**Invest in a position that can coordinate the partnerships with the local early childhood providers:**

- ❖ Determine and identify child care centers in the region.
- ❖ Examine available regional resources (both public and private).
- ❖ Establish shared professional development with incentives.
- ❖ Provide coaching onsite to the child care centers and LEAs.

Connect with Collaborating Partners <http://www.collaboratingpartners.com>

# CCEIS Identifications for FY 2023-2024

- ❖ Need to find out from Seth when the LEAs are going to receive a notification that LEAs are identified.

## CCEIS Application Process

### NEW for FY 2023-2024

- ❖ Identified LEAs will be required to schedule a certain number of calls with DPI staff to review progress....
- ❖ Identified LEAs will be required to schedule a call with Special Education Team fiscal staff towards the end of the fiscal year to discuss the plans for spending the mandatory CCEIS set-aside and to discuss any issues with student reporting.



# CCEIS Application Process

## NEW for FY 2023-2024

- ❖ To streamline the review process so LEAs can access their CCEIS funds more timely, LEAs will identify whether they are in the initial phase funding stage or the implementation stage for each identification (or grouped identifications if they are related).
- ❖ LEAs will provide responses to established prompts for initial or implementation funding in their own document and then save as a PDF and upload to WISEgrants.

## Initial Phase Funding Stage

### Root Cause Analysis has not happened (or not for a long time)

- ❖ Identify the timeline for conducting the root cause analysis (or reviewing the existing root cause analysis).
- ❖ Who (which positions / stakeholders) will be involved in the root cause analysis and why those individuals were chosen.
- ❖ Requested assistance from DPI.

Once reviewed, the LEA will be able to access the CCEIS budget for expenses tied to conducting a root cause analysis, strategy investigation, recruitment and implementation planning (including creating a Continuous Improvement Plan).

# Implementation Phase Funding Stage

## Root Cause Analysis is current

- ❖ Provide a timeframe of when the root cause analysis was conducted or last reviewed.
- ❖ Description of the root cause or factors that were determined through the analysis.
- ❖ Identify the data and summarize the analysis process.
- ❖ List the members of the Continuous Improvement team related to Significant Disproportionality.
- ❖ Explain why the LEA believes the selected strategies will address the root cause.

# CCEIS Application Process

Once the responses have been uploaded, the LEA adds “factor” statements and evidence-based improvement strategies the LEA plans to implement in this fiscal year to address the factors contributing to the significant racial disproportionality.

- ❖ Initial Phase Funding LEAs will have a factor and strategy related to conducting a root cause analysis.
- ❖ The strategies will be tied to expenditure items within the CCEIS budget.
- ❖ Strategies should be broad to encompass several expenditures and not minutely specific such as “Training by CESA.”

The user will connect each strategy to a “Factor” prior to budgeting funds under CCEIS.

# CCEIS Application Process – DPI Review

- ❖ During this time, DPI will review the responses provided by LEAs who have self-identified as either initial or implementation phase funding.
- ❖ To expedite the process, DPI will review the LEA-entered factors and strategies prior to the LEA making “Factor – Strategy” combinations for the purpose of budgeting. This will ensure that CCEIS funds will only be used for factors and strategies that meet the standard.
- ❖ Once factors and strategies are accepted by DPI, they must be made into a factor – strategy combination by the LEA. These combinations are then connected to each expenditure in the CCEIS budget.

## CCEIS Accounting

CCEIS is not used for expenditures tied to the excess cost of special education and related services, but for universal supports that should impact all students but particularly the student groups identified as significantly disproportionate.

**Fund 10**

**Project 341**

**General Education / Pupil Service Functions**

**Source 730**

# Supplement / Not Supplant

Definition: Replacing previously existing costs with federal dollars

For special education, there is no supplement / not supplant provision with IDEA funds if an LEA is meeting maintenance of effort requirements

HOWEVER – cannot supplant Title funds with CCEIS funds

- ❖ Not just Title, any federal funds
- ❖ Existing Title-funded reading teachers cannot be moved onto CCEIS funding

## Funding Timeline

**Once funds are set-aside for Comprehensive CEIS, the LEA must expend the amount within 27-months to remain in compliance.**

- ❖ Expenditures must be for conducting a root cause analysis / creating a continuous improvement plan or tied to other factors determined through a root cause analysis.
- ❖ Carryover of unspent CCEIS funds undergo the same budgeting and review process regardless of current year identification.
- ❖ The continued use of CCEIS funds for long-standing positions or activities will be approved only if the LEA demonstrates the activities are having impact on the *identified student groups*.

# Mandatory Student Reporting

An LEA using CCEIS funds must report annually the students impacted by activities CCEIS dollars.

The LEA will need to flag students in their own student information system (with the program association “Coordinated Early Intervening Services), and this data must get successfully pushed to WISEdata.

Under CCEIS, students with IEPs and students outside of the grade range of K-12 should also be flagged if receiving CCEIS-funded services (unlike voluntary CEIS).

# Mandatory Student Reporting

DPI reports to the US Department of Education, annually, the number of students who were impacted by the use of CEIS funds and then the count of those students without IEPs consequently qualifying for special education services within the next two years.

If an LEA does not identify any students as being served during Year 1 of a required set-aside, then the LEA must identify students during Year 2 even if CCEIS funds are not required in Year 2.

# Technical Assistance

- ❖ **CCEIS- WISEgrants Application Technical Assistance**

<http://bit.ly/cceis-guide>

- ❖ **Wisconsin's Framework for Equitable Multi-Level Systems of Supports**

<https://dpi.wi.gov/sites/default/files/imce/rti/pdf/rti-emlss-framework.pdf>

- ❖ **Wisconsin's Continuous Improvement Process Criteria and Rubric**

[https://dpi.wi.gov/sites/default/files/imce/continuous-improvement/pdf/CIP\\_rubric\\_draft.pdf](https://dpi.wi.gov/sites/default/files/imce/continuous-improvement/pdf/CIP_rubric_draft.pdf)