

# How to Complete the Corrective Action Plan (CAP) Process

## *For Focused Monitoring (FM) CAPs*



This how-to document is intended for **CIMS Coordinators** whose district has been issued a finding of noncompliance and a for a focused monitoring (FM) corrective action plan (CAP). It explains all steps in the FM CAP process including: how to access, complete, and submit an FM CAP, how to complete and submit a progress report, and how to request FM CAP closeout.

### ACCESS THE FM CAP TEMPLATE

1. Log in to the [CIMS Workbook](https://www.cimsmichigan.org) (<https://www.cimsmichigan.org>).
2. *To access your FM CAP through the **tabs**:*
  - a. Click the **Compliance** tab.
  - b. Select the compliance type from the dropdown menu. (For example, B-GSM-FM-CAP-Sept2016.)
  - c. Click **Search**.
  - d. Click the **link** under the Name heading. This will take you to the Compliance & Correction Menu page.
3. *To access your FM CAP through your **Tasks list**:*
  - a. On the Home page, scroll down to the Tasks list.
  - b. Click to expand the *Workbook* in which your finding (FM CAP) was issued.
  - c. Click the **link** under the Compliance & Correction heading. This will take you to the Compliance & Correction Menu page.

### COMPLETE THE FM CAP

The technical assistance (TA) provider and/or intermediate school district (ISD) representative can assist in the selection of members for the review and analysis process (RAP) team. Work with the team to analyze the problem that led to the noncompliance and to develop and complete the FM CAP.

When determining the root cause or underlying problems that caused the noncompliance, focus on district policies, procedures, and practices, or the lack of supports that contributed to the results.

- What changes could correct or improve the problem?

- How can those changes be implemented (e.g., revision of policies or procedures, professional development to change practices, creation of new supports for staff or students)?

Include as many details as possible about:

- The exact activities that will be performed
- The person responsible for each activity
- Event or completion dates
- Documentation of evidence that tasks and activities were completed

Determine how the district can ensure that the noncompliance has promptly been corrected. Will all suspension data be reviewed by an administrator? Will each initial IEP be reviewed for compliance? Will all placement decisions be monitored?

Realistic goals and benchmarks should be set with regard to areas of correction. FM CAPs should be SMART: specific, measurable, attainable, realistic, and time-bound. In many cases, district policies, procedures, and/or practices that contributed to the noncompliance will need to be changed and evidence of this change must be included in FM CAPs.

A CAP approval rubric is available on the CIMS website to assist your CAP development.

To complete your FM CAP in CIMS:

4. Review the resources section prior to completing your FM CAP.
5. Click the **FM CAP Cover Page** under the Forms heading.
6. Complete the FM CAP Cover Page, and click **Save**.  
 To add additional rows to the RAP Team members section, click **Save** after completing the first two rows.
7. Click the **Document Information link** to return to the Compliance & Correction Menu.
8. Click **FM CAP Finding Page** under the Forms heading.
9. Complete the FM CAP Finding Page, and click **Save**. *Have more than one Finding?*
  - a. After you have saved the first FM CAP Finding Page, use the dropdown menu (on the right side of the screen) to access a different finding.
  - b. Click the **Finding** you'd like to view.
  - c. Click **Go**.
  - d. Complete the page, and then click **Save**.

## SUBMIT THE FM CAP TO MDE FOR REVIEW

Once the FM CAP is completed, submit it to the MDE for review. The MDE will either approve the FM CAP as written or return it, with comments, for clarification or modification. An FM CAP must be resubmitted until it is approved.

Districts may also be contacted by the ISD representative or TA provider if any concerns are identified.

10. Click the **Document Information link** to return to the Compliance & Correction Menu page.
11. Click, **Click Here to Change the FM CAP Status** under the header titled Ready to Change the FM CAP Status?
12. Click **Apply Status** to submit your FM CAP to the MDE. Your FM CAP will now be at the status, "FM CAP Submitted to MDE for Review."

### Note about Returned FM CAPs:

If the MDE returns your FM CAP, update the form, and then resubmit (following steps 10-12). The new status will be, "FM CAP Resubmitted to MDE for Review."

## IMPLEMENT FM CAP ACTIVITIES

The district should begin implementing CAP activities once the CAP is submitted. Because the time frame is short and noncompliance should be corrected as soon as possible, districts do not need to wait for MDE approval to begin correction activities.

When implementing the CAP, districts should follow the steps and activities outlined in the plan. It may be necessary to periodically meet with those responsible for implementation to ensure that activities are under way and being executed correctly. RAP team members should be updated on progress.

## COMPLETE THE PROGRESS REPORT

The FM CAP Progress Report is due to the MDE on a timely basis. The schedule for Progress Report submission is available on the CIMS Web site.

The MDE will review all progress reports for evidence of progress and accept or return the reports. The reason for return will be explained in the comment box. Locals may also be contacted by the ISD monitor or TA provider if any concerns are identified.

13. Follow steps 1–3 to access your Compliance & Correction Menu page.  
 [Progress Reports can be found on the CAP menu page under the Compliance tab.](#)
14. Click **Progress Report** under the Forms heading.
15. Provide a brief summary of CAP activities in the text box.
16. Rate your agreement with each statement by clicking a **button**.
17. If necessary, provide additional information, and click **Save**.

## SUBMIT THE PROGRESS REPORT

18. Return to the Compliance & Correction Menu page by clicking the **Document Information link** at the top of the page.
19. Click, **Click Here to Change the CAP Status**.
20. Click **Apply Status** to change the status to "PR Submitted to MDE for Review."



Your Progress Report is now completed and submitted! Once the MDE accepts the Progress Report, the CAP's status will change to "Implement FM CAP; Request TA Verify/Closeout."

**Note:** If the MDE returns your Progress Report, update the form, and then resubmit (following steps 13-20). The new status will be, "PR Resubmitted to MDE for Review."

## REQUEST FM CAP CLOSEOUT

When requesting closeout of an FM CAP, the district assures that all FM CAP activities are complete, that policies, procedures, and/or practices have been changed and implemented to correct all noncompliance (student-level and systemic), and that evidence of correction is ready for review by the TA provider. Consult with your TA provider **before** requesting CAP closeout.

21. Follow steps 1–3 to access your Compliance & Correction Menu page.
22. Click, **Click Here to Change the FM CAP Status**.
23. Click **Apply Status** to change the status to "FM CAP Complete – TA Verify/Closeout."

## VERIFICATION AND CLOSEOUT NEXT STEPS

Once all FM CAP activities are completed and all noncompliance has been corrected, the correction is verified. Two levels of verification of correction are required by the federal Office of Special Education Programs (OSEP) and implemented by the MDE:

- *Prong 1:* The district has corrected each individual case of noncompliance; and
- *Prong 2:* The district is correctly implementing the specific regulatory requirements (i.e., has achieved 100% compliance), based on the State's review of updated data.

Depending upon the activity and indicator, verification activities may be completed by MDE staff, ISD representatives, or TA providers and may include:

- A review of updated policies, procedures, or practices
- A review of student records
- A review of the results of student/child record reviews, or evidence that training or technical assistance was obtained

- A review of new data submitted through the State data systems
- Interviews of district staff

**District staff may be asked to assist in this process, but they have no additional work to complete in CIMS.**

Based on this review, the MDE will establish that the district is correctly implementing the specific statutory or regulatory requirements and that the identified noncompliance has been corrected. Once evidence of correction can be verified, the MDE will notify the district, close the CAP, and issue a closeout report or letter in the next *Workbook*.