

How to Complete the Corrective Action Plan (CAP) Process



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

ACCESS THE CAP

1. Log in to the [CIMS Workbook](https://www.cimsmichigan.org) (<https://www.cimsmichigan.org>).
2. *To access your CAP through the **tabs**:*
 - a. Click the **Compliance** tab.
 - b. Select the compliance type from the dropdown menu. (For example, B-13-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 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 (CAP) was issued.
 - c. Click the **link** under the Compliance & Correction heading. This will take you to the Compliance & Correction Menu page.

COMPLETE THE CAP

Once you access your CAP, work with your review and analysis process (RAP) team to complete the CAP.

When writing a CAP, districts should include as many details as possible about:

- The exact activities that will be performed
- Who is responsible for those activities
- Milestone events and dates of completion
- The concrete evidence that will be used to judge the effectiveness of the CAP for progress reporting

Realistic goals and benchmarks should be set with regard to areas of correction. 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 a CAP.

To complete your CAP in CIMS:

4. Review the resources section prior to completing your CAP.
5. Click the **CAP Cover Page** under the Forms heading.
6. Complete the 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 **CAP Activity Page** under the Forms heading.
9. Complete the CAP Activity Page, and click **Save**.
10. *Need a second CAP Activity Page?*
 - a. After you have saved the first CAP Activity Page, the **ADD** button will be available in the light blue bar at the top of the screen.
 - b. To add additional CAP activity pages click **ADD**, and another page will become available.
 - c. Complete the page, and click **Save**.

SUBMIT THE CAP TO MDE FOR REVIEW

Once a CAP is written, districts will submit it to the MDE for review. The CAP will be reviewed by a team of state-level reviewers on an indicator-by-indicator basis. The MDE will either accept the CAP or return it, with comments, for modifications. A CAP must be resubmitted until it is approved.

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

IMPLEMENT CAP ACTIVITIES

Districts should begin implementing CAP activities once the CAP is submitted. Because the CAP time frame is short, and any noncompliance should be corrected as soon as possible, districts do not need to wait for MDE approval to begin CAP 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 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 the reports. Districts will be contacted by the intermediate school district (ISD) monitor or technical assistance (TA) provider if any concerns are identified.

14. Follow steps 1–3 to access your compliance and correction menu page.



Progress reports can be found on the CAP menu page under the Compliance tab.

15. Click **Progress Report** under the Forms heading.
16. Provide a brief summary of CAP activities in the text box.
17. Rate your agreement with each statement by clicking a **button**.
18. If necessary, provide additional information, and click **Save**.

SUBMIT THE PROGRESS REPORT

19. Return to the Compliance & Correction Menu page by clicking the **Document Information link** at the top of the page.
20. Click, **Click Here to Change the CAP Status**.
21. 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 automatically move to the status, “Implement CAP; Rqst Verify/Closeout when Complete.”

Note: If the MDE returns your Progress Report, update the form, and then resubmit (following steps 14-21). The new status will be, “PR Resubmitted to MDE for Review.”

REQUEST CAP CLOSEOUT

When requesting closeout of a CAP, districts must submit evidence that activities outlined in the CAP have been completed and that policies, procedures, and/or

practices have been implemented to correct all noncompliance (student-level and systemic).

22. Follow steps 1–3 to access your Compliance & Correction Menu page.
23. Click **Request for Verification and Closeout** under the Forms heading.
24. Fill in the “Local Evidence of Correction” section, and click **Save**. The MDE will complete the other text boxes on this page.
25. Return to the Compliance & Correction Menu page by clicking the **Document Information link** at the top of the page.
26. Click, **Click Here to Change the CAP Status**.
27. Click **Apply Status** to change the status to “Verification & Closeout Request Submitted.”

VERIFICATION AND CLOSEOUT NEXT STEPS

Once a district completes the CAP activities and has corrected all noncompliance, the verification of correction process begins. There are two prongs of verification of correction required by the 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*.