



STATE OF MICHIGAN  
DEPARTMENT OF EDUCATION  
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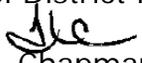
RICK SNYDER  
GOVERNOR

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STATE SUPERINTENDENT

**MEMORANDUM**

**DATE:** April 20, 2016

**TO:** Local Special Education Contacts, Intermediate School District  
Directors of Special Education, and Special Education Intermediate  
School District Planner/Monitors

**FROM:**   
Teri L. Chapman, Ed.S., Director  
Office of Special Education

**SUBJECT:** Cross Indicator Analysis

It has come to our attention that many of you may not be aware of a new activity that has been issued in the CIMS electronic workbook. This activity, the Cross Indicator Analysis, was introduced in a webinar on April 5, 2016 in which ISD monitors and CIMS coordinators were invited to participate. The webinar was recorded and is available at <http://cims.cenmi.org/Events/ForLocals.aspx>. This memo is intended to supplement the information presented in the webinar.

Child Find, transitioning from Part C to Part B services, and the completion of an annual Individualized Education Program (IEP) are basic tenets of the Individuals with Disabilities Education Act. Over 700 districts reported late IEPs in the 2014-2015 school year. This activity is not designed to focus on compliance alone, yet begins the process of systems improvement.

Districts with less than 95% of IEPs completed on time and more than 5 late IEPs, will need to complete a Corrective Action Plan. The Cross Indicator Analysis is a series of questions to address noncompliance across timeline related indicators; B-11 (Child Find), B-12 (Early Childhood Transition) and Timeliness of IEPs. The data being used for all three of these elements are from SY 2014-2015. These are the latest data available to the Michigan Department of Education, Office of Special Education (MDE, OSE). If your district data system contains more recent data, you are encouraged to include that information as part of the activity to determine a pattern of improvement.

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There is an additional requirement that the information be shared with a broader audience than special education personnel. The district improvement team and the local board of education must be informed of the activity. The MDE, OSE will begin verification of this activity in February of 2017. The notification of the Cross Indicator Analysis activity shared with the board of education may be an information item regarding the need to develop a plan for systemic improvement.

Many districts were identified as noncompliant based on missing or incomplete data elements. This is particularly true for B-12. In some cases, student records were submitted with a Part C Transition component complete but without the Initial IEP (Part B) component. Without complete data, the OSE cannot verify these student records as compliant. Missing data is also a factor in Timeliness of IEPs. If a student has two IEPs in a count period, with the latest one submitted on the count date, the earlier IEP would have made the record compliant. That information is not available to the OSE unless it is entered in the Student Record Maintenance (SRM). While SRM data submission is not required, it is useful in documenting compliance. A district with documentation that a student had a timely IEP, may contact Jeanne Anderson-Tippett [andersonstippettj@michigan.gov](mailto:andersonstippettj@michigan.gov) through the LeapFile system <http://Michigan.leapfile.net> and provide that evidence. The district's finding of noncompliance will be rescinded if the additional information indicates 100% compliance.

The MDE, OSE appreciates the opportunity to engage in this new work being completed across the state. Thank you for your collaboration as we move toward the development of a system which balances the compliance requirements with the need to improve educational outcomes for students with disabilities.