

Guidance for Creating B-13 Corrective Action Plans (CAPs)

Did your district receive a finding of noncompliance for B-13 (Secondary Transition)? This document will help you write your Corrective Action Plan (CAP). It includes recommended activities your district should complete to correct noncompliance. While using this guide does not ensure your CAP is approved, the Office of Special Education (OSE) **strongly recommends** all districts use this guide to write their CAP.

Step 1: Identify Areas of Noncompliance

The first step in writing your district's CAP is to identify the areas of noncompliance that must be addressed.

Your district may have up to 10 areas of noncompliance to address (based on the 10 questions reviewed during the spring data collection).

See page two of your Letter of Finding (available on your Reports Page in CIMS) for a summary of your district's performance on each question.

- If your district has a compliance rate of 100% on a question, you **do not** need to address this area in your Plan.
- If your district has a compliance rate between 0% and 99%, you **must** address this area in your Plan.

Step 2: Convene your RAP Team

A Review and Analysis Process (RAP) Team leads a district's effort to create and implement a CAP. Districts must identify team members that are most likely to help solve their noncompliance. Suggested members include special education administrators, general education administrators, ISD representatives, school improvement team representatives, parents, data experts, transition coordinators, and program specialists.

Step 3: Complete the CAP Cover Page

In CIMS, all CAPs begin with a CAP Cover Page.

- Enter the members of your district's RAP Team. Districts must have at least two members on their RAP Team.
- Leave the comment boxes blank. If OSE has comments on your CAP during the review process, you'll be able to view those comments here. For now, leave all comment boxes blank.

Step 4: Address Questions 1, 2, and 3 on the CAP Activity Page

If your district has noncompliance on questions 1, 2, and/or 3, your district must create a CAP Activity Page named: **IEP Team Participants**.

In CIMS, districts use the CAP Activity Page to describe the actions and activities a district will take to solve a specific problem.

a. Summarize your root cause analysis

The first question on the CAP Activity page asks you to summarize your district's analysis of your data.

b. Describe what your district will do to correct the problem

The second question on the CAP Activity Page asks you to identify the actions your district will complete for this activity. To correct noncompliance on questions 1, 2, and/or 3 districts must complete two actions: update procedures and conduct professional development. *Include only the subsections related to your district's areas of noncompliance.*

Tip: It is okay to copy and paste. *The actions below are written so your district may copy and paste text from this document into your CAP.*

Update Procedures: The district will revise or develop procedures to ensure that at future IEPs where transition services will be discussed documentation is maintained that:

- Question 1 - the student was invited to the IEP Team meeting where transition services were discussed;
- Question 2 - prior consent of the parent or student, who has reached age of majority, is requested or obtained to invite an agency;
- Question 3 - if appropriate, a representative of any participating agency was invited prior to the IEP Team meeting.

Don't Forget! Questions 1-3 are listed here, but your district may not have noncompliance to address in all three questions. Include only the subsections related to your district's areas of noncompliance.

Tip: For example: *District X missed questions 1 and 3 on the B-13 Data Collection activity.*

District X's first action reads, "Update Procedures: District X will revise or develop procedures to ensure that at future IEPs where transition services will be discussed documentation is maintained that: (Question 1) the student was invited to the IEP Team meeting where transition services were discussed; and (Question 3) if appropriate, a representative of any participating agency was invited prior to the IEP Team meeting.

Conduct Professional Development: The district will provide professional development to all relevant staff on the new procedures.

c. Identify and describe your activities

After describing what your district must correct and the actions you'll take to achieve correction, your CAP must provide details about which activities will be completed, by when, and by whom.

Tip: For example: Activities for, "Conduct Professional Development," might be:

- Develop training materials (PowerPoint, tip sheet, and monitoring checklist) related to new procedures regarding documenting prior consent of a parent or student to invite an agency
- Host training on MM/DD/YY

d. Identify documentation

On question 4, you must identify the documentation you will provide as evidence that each activity was completed. Documentation may be a document (such as a Word document or PowerPoint) or a link.

Your district will be required to provide all documentation identified here when you request closeout.

Sample documentation:

- Agenda
- Sign in sheet
- PowerPoint presentation
- New procedures or policies

e. Identify how you will monitor progress

On question 5, you must explain how your district will monitor implementation of the change in practice following the tasks and activities identified in your CAP. This internal monitoring will help ensure your district achieves compliance moving forward. You must identify who will complete the monitoring and details regarding how many files will be reviewed.

You might include tools such as:

- Monthly data pulls
- Monthly record reviews

Step 4: Address Questions 4 - 10 on the CAP Activity Page

If your district has noncompliance on questions 4, 5, 6, 7, 8, 9, and/or 10, your district must create a CAP Activity Page named: **IEP Development**.

Tip: If your district must address both IEP Team Participants AND IEP Development, create two CAP Activity Pages.

a. Summarize your root cause analysis

The first question on the CAP Activity page asks you to summarize your district's analysis of your data.

b. Describe what your district will do to correct the problem

The second question on the CAP Activity Page asks you to identify the actions your district will complete for this activity. To correct noncompliance on questions 4 through 10 districts must complete two actions: update procedures and conduct professional development, at your district. The specific action description will vary depending on your district's areas of noncompliance. *Include only the subsections related to your district's areas of noncompliance.*

Don't Forget! B-13 CAPs must include both actions (update procedures, and conduct professional development,). For each action, include a description that identifies which questions your district must address.

Update Procedures: The district will revise or develop procedures to ensure future IEPs where transition services will be discussed include:

- Question 4 - postsecondary goals based on age appropriate transition assessment(s);
- Question 5 - appropriate measurable postsecondary goals;
- Question 6 - postsecondary goals that are updated annually;
- Question 7 - transition services to meet postsecondary goals;
- Question 8 - courses of study that will reasonably enable the student to meet their postsecondary goals;
- Question 9 - annual IEP goal(s) related to the student's transition services needs; and
- Question 10 - consideration of the student's needs including strengths, preferences, and interests.

Tip: For example: *District X missed questions 4, 7, and 9 on the B-13 Data Collection activity.*

District X's first action reads, "Update Procedures: District X will revise or develop procedures to ensure future IEPs where transition services will be discussed: (Question 4) postsecondary goals based on age appropriate transition assessment(s); (Question 7) transition services to meet postsecondary goals; and (Question 9) annual IEP goal(s) related to the student's transition services needs."

Conduct Professional Development: The district will provide professional development to all relevant staff on the new procedures.

c. Identify and describe your activities

After describing what your district must correct and how you'll take to achieve correction, your CAP must provide details about which activities must be completed, by when, and by who.

Tip: For example: Activities for, "Conduct Professional Development," might be:

- *Develop training materials (PowerPoint, tip sheet, and monitoring checklist) related to new procedures for ensuring that appropriate measurable postsecondary goals are included in all IEPs where transition services are discussed*
- *Schedule training*
- *Host training*

d. Identify documentation

On question 4, you must identify the documentation you will provide as evidence that each activity was completed. Documentation may be a document (such as a Word document or PowerPoint) or a link.

Your district will be required to provide all documentation identified here when you request closeout.

Sample documentation:

- Agenda
- Sign in sheet
- PowerPoint presentation
- New procedures or policies

e. Identify how you will monitor progress

On question 5, you must explain how your district will monitor implementation of the change in practice following the tasks and activities identified in your CAP. This internal monitoring will help ensure your district achieves compliance moving forward. You must identify who will complete the monitoring and details regarding how many files will be reviewed.

You might include tools such as:

- Monthly data pulls
- Monthly record reviews

Step 5: Add Activity Pages

Your district may also choose to add additional CAP Activity Pages to your CAP, depending on the root cause of your noncompliance. The OSE recommends adding

additional CAP Activity Pages if you believe the actions described above will not address the systematic problem that lead to your district's noncompliance.

Step 6: Review and Submit Your Plan

Once your CAP is complete, click, "Print Version" to review your complete CAP.

After reviewing your district's CAP, return to the Forms Menu, and change the status to submit your CAP to the OSE for approval.

Questions?

For questions about how to complete the CAP process in CIMS, contact the CIMS Help Desk at 877-474-9023 or help@cismichigan.org.

For help writing your CAP, contact your ISD representative. Not sure how to contact your ISD representative? Visit the [CIMS training website](http://cims.cenmi.org) (cims.cenmi.org). From the home page, click on the Resource Library. In the CIMS Overview, click, "Who's My ISD representative?"

For clarification about this guidance, contact Shawan Dortch at the Office of Special Education at DortchS@michigan.gov.