

Continuous Improvement & Monitoring System

Office of Special Education

Why CIMS?

A reference guide designed to help locals understand their role in Michigan's general supervision system and special education monitoring efforts

To learn more about CIMS,
visit our Web site at:
<http://cims.cenmi.org>



This manual was produced and distributed through an IDEA Mandated Activities Project for the Continuous Improvement and Monitoring System (CIMS).
Revised August 2014

Dear CIMS User,

Welcome to *Why CIMS?*, a reference guide designed to help locals (local educational agencies, public school academies, service areas, and state-run agencies) understand their role in both Michigan's general supervision system and special education monitoring efforts. This guide starts with a broad view and outlines the federal government's requirements through the *Individuals with Disabilities Education Act* (IDEA) 2004, and how Michigan implements them. The remainder of the guide focuses specifically on the Continuous Improvement and Monitoring System (CIMS), Michigan's integrated monitoring system.

Why CIMS? is not a how-to document or training manual, but rather helps CIMS users put their work into context. Should you need assistance logging into CIMS, completing *Workbook* activities, understanding reports, or simply looking for additional training resources, please:

1. Visit the CIMS Web site at <http://cims.cenmi.org/>
2. Contact the CIMS Help Desk
 - a. Part B: help@cismmichigan.org or (877) 474-9023
 - b. Part C: eotweb@edzone.net or (866) 334-5437

Thank you for your support as we strive to increase student achievement for all children with disabilities statewide. We look forward to working with you throughout the school year.

Sincerely,

The CIMS Team

STATE BOARD OF EDUCATION

JOHN C. AUSTIN – PRESIDENT • CASANDRA E. ULBRICH – VICE PRESIDENT
NANCY DANHOF – SECRETARY • MARIANNE YARED MCGUIRE – TREASURER
RICHARD ZEILE – NASBE DELEGATE • KATHLEEN N. STRAUS
DANIEL VARNER • EILEEN LAPPIN WEISER

608 WEST ALLEGAN STREET • P.O. BOX 30008 • LANSING, MICHIGAN 48909
www.michigan.gov/mde • (517) 373-3324

Contents

Acronyms

Special Note

Introduction

Chapter 1: An Overview of Special Education

Chapter 2: Michigan's Implementation of IDEA 2004

Chapter 3: CIMS *Workbook* Tasks & Activities

Chapter 4: Review and Analysis Process Teams

Appendix for RAP Teams: FAQs, Sample Letters, Checklists

Acronyms

APR	Annual Performance Report
AYP	Adequate Yearly Progress
BAA	Bureau of Assessment and Accountability
CAP	Corrective Action Plan
CEN	Center for Educational Networking
CEPI	Center for Educational Performance and Information
CIMS	Continuous Improvement and Monitoring System
CNA	Comprehensive Needs Analysis
DIP	District Improvement Planning Team
EO	<i>Early On</i> [®]
EOT&TA	<i>Early On</i> [®] Training and Technical Assistance
ESEA	<i>Elementary and Secondary Education Act</i>
FAPE	Free appropriate public education
FM	Focused monitoring
GSM	General supervision monitoring
IDEA	<i>Individuals with Disabilities Education Act</i>
IEP	Individualized education program
IFSP	Individualized family service plan
ISD	Intermediate school district
LEA	Local educational agency
LICC	Local Interagency Coordinating Council
LRE	Least restrictive environment
MAR	Monitoring Activities Report
MARSE	<i>Michigan Administrative Rules for Special Education</i>
MDE	Michigan Department of Education
MVU	<i>Michigan Virtual University</i> [®]
MEGS	Michigan Electronic Grants System
MICC	Michigan Interagency Coordinating Council
MSDS	Michigan Student Data System
NCLB	<i>No Child Left Behind</i>

OEII	Office of Education Improvement and Innovation
OGS	Office of Great Start
OSE	Office of Special Education
OSEP	Office of Special Education Programs (U.S. Department of Education)
PAC	Parent Advisory Committee
Part B	Part B of the IDEA
Part C	Part C of the IDEA
RAP	Review and Analysis Process
PSA	Public school academy
RESA	Regional Educational Service Agency
RESD	Regional Educational Service District
SA	Service Area
SBE	State Board of Education
SEA	State Education Agency
SEAC	Special Education Advisory Committee
SICC	State Interagency Coordinating Council
SIT	School Improvement Team
SLCAP	Student Level Corrective Action Plan
SPP	State Performance Plan

Special Note

Locals — A comprehensive term used in CIMS to describe local educational agencies, public school academies, service areas, and state-run agencies.

Chapter

1

An Overview of Special Education

“(1) Disability is a natural part of the human experience and in no way diminishes the right of individuals to participate in or contribute to society. Improving educational results for children with disabilities is an essential element of our national policy of ensuring equality of opportunity, full participation, independent living, and economic self-sufficiency for individuals with disabilities.”

[34 CFR 300.601(c)]

A History of Special Education

In 1975, Congress passed the *Education for All Handicapped Children Act* (Public Law 94-142). This landmark legislation required states and locals to provide a free, appropriate, public education to every child with a disability between the ages of 3 and 21. The law also required that children be educated according to an individualized education plan in the least restrictive environment.

The *Act* had a dramatic effect on the educational opportunities for children with disabilities. In 1970, for example, “U.S. schools educated only one in five children with disabilities, and many states had laws excluding certain students, including children who were deaf, blind, emotionally disturbed, or mentally retarded.”¹ Now, almost 7 million children, between birth and age 21, receive special education services under the current iteration of the law, the *Individuals with Disabilities Education Act* (IDEA) 2004.²

¹ U.S. Office of Special Education Programs. (N.d.). History: Twenty-five years of progress in educating children with disabilities through IDEA. Available online at: <http://www2.ed.gov/policy/speced/leg/idea/history.pdf>

² Data Accountability Center. (2008). Part B and C Child Count. Individuals with Disabilities Education Act (IDEA) Data. Available online at: http://www.ideadata.org/arc_toc10.asp#partcCC.

Although the *Education for All Handicapped Children Act* originally required services for children ages 3–21, Congress created the Preschool Incentive Grant in 1986 to address an urgent need to support the development of infants and toddlers. In later iterations of the *Act*, Congress included educational requirements for children with disabilities from birth to 3. The two age groups have slightly different regulations, and are referenced as Part B, for children 3–21, and Part C, for children birth–3.

Over the years, specific requirements of the *Act* have changed, but the spirit of the original legislation has remained intact.

IDEA 2004

The current authorizing federal statute for special education programs and early intervention services is the IDEA 2004. New federal accountability measures required under the IDEA 2004 include:

- Development of a State Performance Plan (SPP) and submission of an Annual Performance Report (APR)
- Public reporting
- Determinations

Development of a State Performance Plan and Submission of an Annual Performance Report

The IDEA 2004 requires each state to develop an SPP to evaluate its efforts toward implementing the requirements and purposes of the IDEA and to indicate how the state will continuously improve upon this implementation. The SPP is one component of Michigan’s system of general supervision.

The objective of the SPP requirement is to have each state:

- Focus on a small number of outcome-oriented priorities
- Identify objective, data-based indicators that show priorities are being implemented
- Set targets for the indicators
- Report on targets set by the federal government
- Identify when intervention is necessary and at what level
- Define accountability actions such as technical assistance and sanctions for failure to meet objective, data-supported standards.

IDEA 2004 Requires:

- Development of a State Performance Plan (SPP) and submission of an Annual Performance Report (APR)
- Public reporting
- Determinations

Each year states are required to collect data from their locals and report on progress toward meeting the targets of their SPP through the submission of an Annual Performance Report (APR). The APR is due on February 1.

The federal Office of Special Education Programs (OSEP) identified three priority areas to monitor for Part B (children and youth ages 3–21) and two priority areas for Part C (birth–3).

The Part B priority areas are:

- The provision of a free appropriate public education (FAPE) in the least restrictive environment (LRE)
- Disproportionate representation of racial and ethnic groups in special education and related services, to the extent the representation is the result of inappropriate identification
- State exercise of general supervisory authority, including child find, effective monitoring, the use of resolution sessions, mediation, voluntary binding arbitration, and a system of transition services

The Part C priority areas are:

- Early intervention services in the natural environment
- Effective general supervision, including child find and effective transition

Public Reporting

The IDEA 2004 also requires states to publicly report on the progress and performance of its locals against the targets established in the SPP. The report must indicate what is working well in a state's special education and early intervention programs and identify what aspects of those programs are in need of improvement. Michigan's current SPP can be found at

<http://www.michigan.gov/mde/>.

Determinations

Based on the information provided in the state's APR and the outcomes of monitoring visits and other monitoring data, the OSEP decides if each state meets the requirements and purposes of the IDEA, and issues determinations. Determinations, which are similar to report cards, assign each state one of the following levels:

- (1) Meets the requirements of the IDEA 2004
- (2) Needs assistance in implementing the requirements of the IDEA 2004
- (3) Needs intervention in implementing the requirements of the IDEA 2004
- (4) Needs substantial intervention in implementing the requirements of the IDEA 2004

Connecting the IDEA 2004 to the Elementary and Secondary Education Act (ESEA)

The move toward accountability in public education is not limited to the IDEA 2004. In 2002, the *Elementary and Secondary Education Act* (ESEA) was reauthorized, under the name of *No Child Left Behind* (NCLB). It established accountability measures aimed at improving academic achievement for all public school children. The ESEA and the IDEA 2004 work together in several ways to provide instruction and accountability for students in the special education sub-group. These connections include:

- Defining required academic content and achievement standards
- Requiring standardized testing/assessments
- Promoting accountability
- Requiring highly qualified staff

The State System of Supervision

In order to ensure all eligible children are provided the services they are entitled to, each state has a responsibility to have a system of general supervision that monitors the implementation of the IDEA 2004. Through the activities of general supervision, the state supervises the special education programs that directly provide the services and supports necessary to fulfill the requirements of law.

States are expected not only to comprehensively monitor locals to ensure compliance, but also to promote continuous improvement. To achieve this two-part goal, states must have a general supervision system with eight components.

Components of a General Supervision System

As defined by the National Center for Special Education Accountability Monitoring (NCSEAM), an effective system of general supervision must include each of the following components:

1. State Performance Plan (SPP)
2. Policies, procedures, and effective implementation
3. Data on processes and results
4. Targeted technical assistance and professional development
5. Effective dispute resolution
6. Integrated monitoring activities
7. Improvement, correction, incentives, and sanctions
8. Fiscal management

Integrated Monitoring Activities

The IDEA 2004 emphasizes that monitoring activities should focus primarily on two goals: (1) improving educational results and functional outcomes for all children with disabilities, and (2) ensuring compliance with the IDEA Part B and Part C, with particular emphasis on those requirements that are most closely related to improving educational results for children with disabilities.

To have an effective general supervision system, states and locals must be able to collect, examine, evaluate, and report data demonstrating both compliance and improvement. Monitoring activities, and in particular the analysis of data, identify not only concerns at the state and local level but also potential solutions in the form of targeted technical assistance and professional development.

Chapter 2

Michigan's Implementation of IDEA 2004

In response to the requirements of the IDEA 2004, Michigan has developed an integrated monitoring system, created an SPP, provides public reporting, and issues local determinations.

Michigan's Integrated Monitoring System — CIMS

Monitoring activities in Michigan are aligned directly with all Part B and Part C State Performance Plan (SPP) indicators contained in the IDEA 2004. Michigan collects data systematically on these indicators to check locals' progress toward various results and compliance targets.

The Continuous Improvement and Monitoring System (CIMS) is the monitoring system used by the Michigan Department of Education (MDE) Office of Special Education (OSE) and Office of Great Start (OGS). The State uses this system to promote positive outcomes and ensure compliance with the IDEA 2004 and the *Michigan Administrative Rules for Special Education* (MARSE).

CIMS was designed to help the State and locals analyze and interpret data, and also keep track of all monitoring activities in a single location. CIMS reflects the priorities of the IDEA 2004 and the SPP, and is aligned with the School Improvement Framework.

Michigan's State Performance Plan (SPP)

Preparation for the development of Michigan's SPP began in the summer of 2005 when the OSE and Early Childhood Education and Family Services (now known as the OGS) gathered to review the IDEA 2004 and gain a better understanding of the SPP requirements. In 2005 and 2006, teams of stakeholders were identified to work on individual indicators identified in the law. These stakeholder teams included:

- The OSE (Part B)/OGS (Part C)
- The MDE Division of Accountability Services

**There are 20 SPP
indicators for
Part B and
14 indicators
for Part C**

- The MDE Office of Education Improvement and Innovation
- Grantees and contractors involved with various statewide initiatives
- Parents
- Practitioners and administrators
- The Special Education Advisory Committee (SEAC) and the Michigan Interagency Coordinating Council (MICC)

The stakeholder teams were given the following tasks:

- Analyze the indicators to understand intent and meaning
- Review relevant data (state, local, national, similar states, etc.)
- Determine a baseline
- Analyze the efficacy and impact of various formulae and calculations
- Recommend data collection approaches
- Identify measurable and rigorous targets
- Determine improvement activities
- Identify resources to implement improvement activities

The outcome of these stakeholder meetings was the development of the SPP for Parts B and C. The targets for Michigan's SPP can be divided into two categories: (1) **compliance indicators** with targets set by the federal government at either 0% or 100%, depending on the indicator; and (2) **results indicators** with original targets set by a State work group.

The current SPP is in effect from FFY 2005 through FFY 2012. It is updated each year to report new targets (as requested by the OSEP or the MDE), new calculations, or new baseline data for phased-in indicators. The following charts show the indicator targets for Parts B and C.

State Performance Plan (SPP)			
<i>Results and Compliance Indicator Targets for Part B</i>			
Results Indicators		Targets	
		FFY 2012	FFY 2013
1:	Graduation	80%	80%
2:	Dropout	<8%	<8%
3:	Statewide Assessment		
	A. Adequate Yearly Progress	98%	98%
	B. Participation	95%	95%
	C. Proficiency	Varies by grade level/content area	
4A:	Suspension/Expulsion	<4.5%	<4.5%
5:	Educational Environments		
	A. Inside the regular class 80% or more of the day	≥63%	≥63%
	B. Inside the regular class less than 40% or more of the day	≤11.9%	≤11.9%
	C. In separate schools, residential facilities, or homebound/hospital placements	≤4.8%	≤4.8%
6:	Preschool Educational Environments		
	A. Inside a regular early childhood program the majority of the day (ages 3-5)	N/A	28.2%
	B. In separate class, school, or residential facility (ages 3-5)	N/A	43.2%
7:	Preschool Outcomes (by age 6 or exit from the program)		
	A. Positive social-emotional skills		
	1. Percentage of children entering program below age expectations who substantially increased rate of growth	87%	87%
	2. Percentage of children functioning within age expectations	61%	61%
	B. Acquisition and use of knowledge and skills		
	1. Percentage of children entering program below age expectations who substantially increased rate of growth	87%	87%
	2. Percentage of children functioning within age expectations	59%	59%
	C. Use of appropriate behaviors to meet needs		
	1. Percentage of children entering program below age expectations who substantially increased rate of growth	89%	89%
	2. Percentage of children functioning within age expectations	73%	73%
8:	Facilitated Parent Involvement		
	A. Preschool (3-5)	35.5%	35.5%
	B. School-age (6-21)	22%	22%
14:	Postsecondary Outcomes		
	A. Enrolled in higher education within one year of leaving high school	34.3%	34.3%
	B. Enrolled in higher education or competitively employed within one year of leaving high school	58.4%	58.4%
	C. Enrolled in higher education or some other postsecondary training program; or competitively employed or in some other employment within one year of leaving high school	71.4%	71.4%
18:	Resolution Session Agreements	42%	42%
19:	Mediation Agreements	80%	80%
Compliance Indicators		Targets	
4B:	Suspension/Expulsion	0%	
9:	Disproportionate Representation—Child with a Disability	0%	
10:	Disproportionate Representation—Eligibility Categories	0%	
11:	Child Find	100%	
12:	Early Childhood Transition	100%	
13:	Secondary Transition	100%	
15:	Compliance Findings	100%	
20:	Timely and Accurate Data	100%	

Current as of Summer 2013

This chart of indicators was produced and distributed through an IDEA Mandated Activities Project for the Continuous Improvement and Monitoring System (CIMS).



State Performance Plan (SPP)	
<i>Results and Compliance Indicator Targets for Part C</i>	
Results Indicators	FFY 2012 Targets
2: Settings in Natural Environments	93%
3: Child Outcomes	
A. Positive social-emotional skills	
1. Percentage of children entering program below age expectations who substantially increased rate of growth	76.3%
2. Percentage of children functioning within age expectations	60.8%
B. Acquisition and use of knowledge and skills	
1. Percentage of children entering program below age expectations who substantially increased rate of growth	79.5%
2. Percentage of children functioning within age expectations	51.2%
C. Use of appropriate behaviors to meet needs	
1. Percentage of children entering program below age expectations who substantially increased rate of growth	79.5%
2. Percentage of children functioning within age expectations	60.1%
4: Family Outcomes	
A. Know their rights	58.4%
B. Effectively communicate their children's needs	53.4%
C. Help their children develop and learn	77.4%
5: Child Find Birth-1	1.24%
6: Child Find Birth-3	2.7%
13: Mediations	NA
Compliance Indicators	Targets
1: Timely Service Delivery	100%
7: Timeliness of IFSPs	100%
8: Early Childhood Transition	
A. Transition planning	100%
B. Notification to the LEA	100%
C. Timely transition conference	100%
9: Part C Monitoring System	100%
10: Administrative Complaints	100%
11: Due Process Hearings	100%
12: Resolution Session Agreements	100%
14: Data Accuracy	100%

Current as of Fall 2013

This chart of indicators was produced and distributed through an IDEA Mandated Activities Project for the Continuous Improvement and Monitoring System (CIMS).



Michigan's Public Reporting

The United States Department of Education requires all states to report annually to the public on the progress and performance of each local against the targets established in the SPP.

The district and service area data for the FFY 2012 APR are available at the Michigan Department of Education, Office of Special Education Web site at <http://www.michigan.gov/ose-eis> through the Special Education State Performance Plan/Annual Performance Report link on the left side.

Public reporting provides locals and their communities an opportunity to see what is working well in their special education and early

District data is also available at www.mischooldata.org for districts and the public.

intervention programs and identify what aspects of those programs are in need of improvement. Public reporting must include broad dissemination, be accessible to individuals with disabilities, and be understandable to the general public.

Public reporting is required on Part B (3-21 year olds) SPP Indicators 1-5 and 7-14 and Part C (Birth through age 2 and called *Early On*[®] in Michigan) for Indicators 1-8. For public reporting of Part B Indicators 3, 5, and 7-12, the data reflected the last complete academic year. However, for Indicators 1, 2, and 4 there is a required one-year data lag, and the data used were from the academic year preceding the last. For example, the 2012 report for Indicators 3, 5, and 7-12 were based on the 2010-2011 data but for Indicators 1, 2, and 4 the data used were from 2009-2010. Public reporting on Part C, Indicators 1-8, was based on the data for infants and toddlers ages birth-3 from the prior academic year. For example, the 2012 report used data from the 2010-2011 academic year. Public reporting must occur within 120 days of the State's submission of the APR.

Michigan's Determinations

Federal law requires Michigan to issue determinations annually for each of its locals. When issuing determinations, Michigan considers a subset of SPP indicators and other data for a single, point-in-time report card categorizing a local's performance in meeting the requirements of the IDEA 2004. The following factors, which change annually, were considered when issuing local 2013 determinations:

- Performance on compliance indicators (4B, 9, 10, 11, 12, 13, and 15)
- Submission of valid, reliable, and timely data
- Audit findings
- Timely individualized education programs (IEPs)
- Additional information as necessary

The determination levels issued by the State to its locals are the same as those the federal government uses for state-level determinations:

- (1) Meets the requirements of the IDEA 2004
- (2) Needs assistance in implementing the requirements of the IDEA 2004
- (3) Needs intervention in implementing the requirements of the IDEA 2004
- (4) Needs substantial intervention in implementing the requirements of the IDEA 2004

Determination levels help the State identify locals in need of technical assistance, training, or enforcement action to bring them into full compliance with the IDEA 2004.

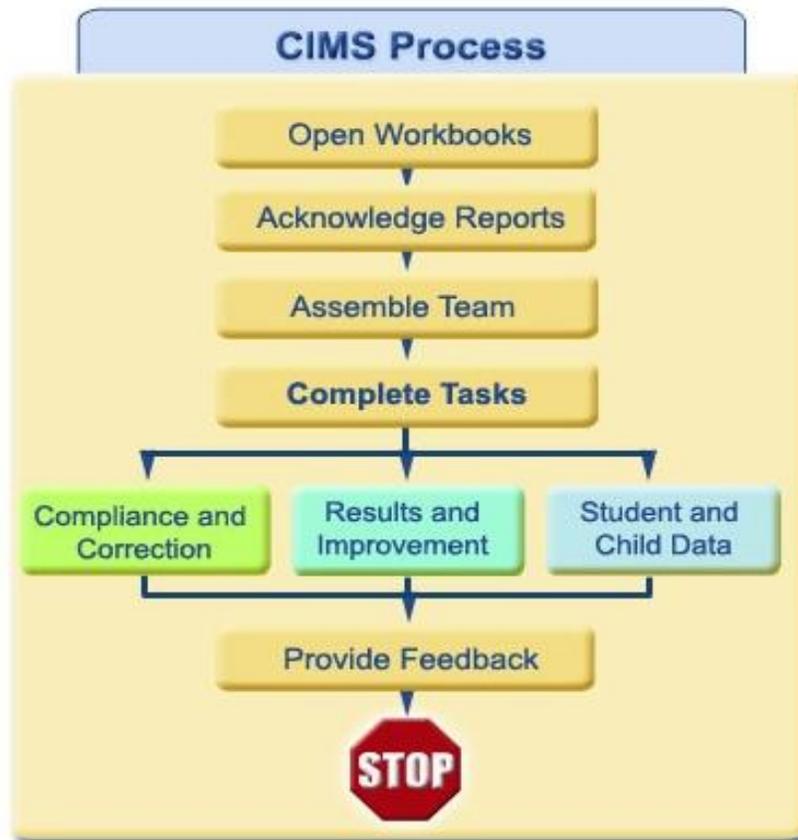
Michigan and the IDEA/ESEA Connection

Because students with IEPs are a disaggregated subgroup in a school's Adequate Yearly Progress (AYP) calculation for both assessment and access to the general education curriculum, the performance of a local's special education program may have a direct impact on a school's ability to make AYP. To help local school improvement teams assess this impact, questions about special education subgroup performance have been inserted in both the district and building Comprehensive Needs Analysis (CNA) that is completed as part of the district and school improvement planning processes.

Chapter 3

CIMS *Workbook* Tasks & Activities

Both the State and locals use the CIMS electronic *Workbook* to track monitoring activities. The CIMS *Workbooks* are released on August 15 (Part B), September 15 (Part C), December 15 (Parts B and C), and April 15 (Parts B and C). While each *Workbook* contains slightly different reports, the process for responding to *Workbooks* is the same for each release. Below is a visual summary of the CIMS process:



Open the Workbook

The first step in the CIMS process is logging into the *Workbook*. The CIMS electronic *Workbook* is located at <https://www.cimsmichigan.org/>. Directions on how to log in to the *Workbook* can be found on the CIMS Web site under the *Workbook* tab.



Acknowledge CIMS Reports

The CIMS *Workbook* provides each local with a series of reports to place data into context and assists the local in starting the correction and improvement



processes. These reports must be acknowledged before acting on other CIMS activities. Instructions on how to view and acknowledge reports are available on the CIMS Web site. Common CIMS *Workbook* reports are listed below.

Strand Report

The Strand Report provides a measure of a local's performance against the SPP indicator targets and is based on data submitted by the State in the APR.

The Strand Report must be reviewed by the review and analysis process (RAP) team as the report may indicate further activities that must be completed.

Monitoring Activities Report (MAR)

A MAR provides information on the MDE's monitoring activities that affect the local. It is included with each local's *Workbook* and gives important information about monitoring activities. Items in a MAR may require action. Locals must review the report in each *Workbook* and proceed with actions as outlined in the report.

Determinations Report

As described in Chapter 2, the Determinations Report is an annual rating of a local's performance in meeting the requirements of the IDEA 2004. The Determinations Report must be reviewed by the RAP team but does not require further action.

Report of Findings

When the State finds evidence that a local is not in compliance with state or federal rules or regulations, the State must notify the local in writing of the noncompliance. The notification must include:

- The citation of the statute, regulation, or rule for which the data are not in compliance.
- A description of the quantitative or qualitative data supporting the State’s conclusion that there is noncompliance with that statute or regulation.
- The requirement that the noncompliance be corrected as soon as possible and in no case later than one year after the State’s identification (i.e., the date on which the State provided written notification to the local of the noncompliance). Verification of correction must occur within the one-year timeline as well.

A Report of Findings may be issued in CIMS after a focused monitoring activity. Sources of data for findings include focused monitoring, data reviews from the State’s data systems, and other monitoring activities. These reports should be downloaded and shared with the local’s superintendent and RAP team.

A Report of Findings requires action. A corrective action plan (CAP) is required for all findings of noncompliance and is due to the MDE within 45 days of notification of the noncompliance.

Report of No Findings

When the State completes its focused monitoring activities for a local and no evidence of noncompliance is found, a Report of No Findings is issued to the local.

A Report of No Findings should be reviewed, downloaded and shared with the local’s superintendent and RAP team, but requires no further action.

Closeout Letter

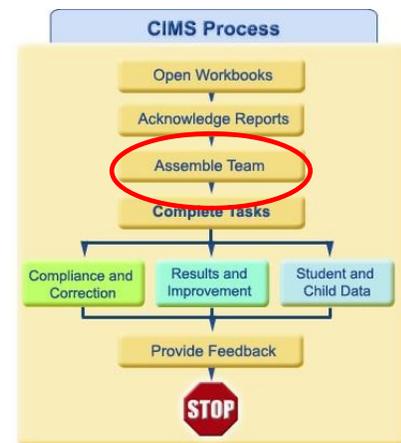
A closeout letter is written notification from the MDE of successful completion of the CAP process. These letters are included in the CIMS *Workbook*.

Other Types of Reports

Additional reports may be included in the *Workbook* at the discretion of the MDE.

Assemble a RAP Team

After acknowledging CIMS reports, the CIMS coordinator convenes a RAP team. RAP teams have two primary charges: (1) review reports, and (2) complete tasks. If data reveal areas of noncompliance, corresponding actions will be listed in a Report of Findings.



More detail about convening and leading a RAP team follows in Chapter 4 RAP Teams.

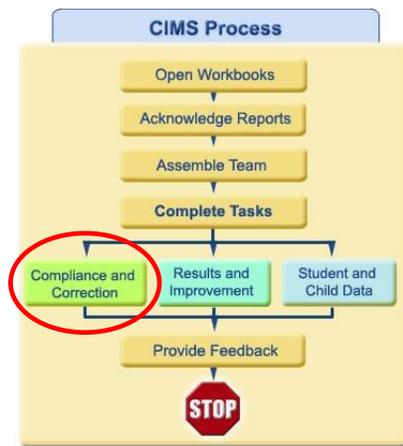
Complete Tasks

CIMS work is organized into three basic categories: compliance and correction (available under the "Compliance" tab in the *Workbook*); results and improvement (available under the "Results" tab in the *Workbook*); and student and child data (available under the "Data" or "Compliance" tab in the *Workbook*).

Compliance and Correction

The first category of CIMS work is compliance and correction. If a local is issued a Report of Findings, it must address this noncompliance by: (1) identifying the root cause of the areas of noncompliance and developing a CAP, (2) implementing the CAP, and (3) completing the verification of correction process.

Locals issued findings as a result of the focused monitoring (FM) process, must develop and complete FM CAPs. FM CAPs contain slightly different forms, but follow the same process as CAPs issued based on data reviews.



Note: CAPs must be written and implemented within a specific time frame. Please see the CIMS Web site (<http://cims.cenmi.org>) for each *Workbook's* specific timeline. These dates allow time for the State to verify that correction of the noncompliance has occurred as soon as possible, but in no case later than one year.

Identify CAP Activities

The first step in writing an effective CAP is identifying appropriate activities to correct the noncompliance. The CIMS *Workbook* contains CAP forms to guide this process. The CIMS Web site also contains sample CAP forms and additional resources.

The MDE recommends evidence-based research activities be used since these practices have been tested and shown to improve results in educational or early intervention settings. A list of resources can be found in the "What Works Clearinghouse" Web site located at <http://ies.ed.gov/ncee/wwc/>.

Write a CAP

When writing a CAP, locals 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.

CAPs should be **SMART**:

Specific,
Measurable,
Attainable,
Realistic, and
Time-bound

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 noncompliance will need to be changed and evidence of this change must be included in a CAP.

Submit CAP for Review

Once a CAP is written, locals 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.

Implement CAP Activities

Locals 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, locals do not need to wait for MDE approval to begin CAP activities.

Locals should not wait for MDE approval to begin working on implementing CAP activities.

When implementing the CAP, locals 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.

Evaluate CAP Activities

The RAP team must establish a method of evaluating implemented CAP activities either by a process evaluation or by measuring impact. Evaluation is an organized method of assessing whether improvement is being achieved effectively and within the required time frame.

A process evaluation can help determine how well a corrective action activity is being implemented and whether adjustments need to be made to a CAP mid-year. Process evaluation questions include:

- Has the activity been implemented as the RAP Team intended?
- Is the activity reaching the targeted audience (administrators, teachers, parents, students)?

- Is everyone doing what they said they would do—and will they continue to do so?

Measuring impact is another method of evaluating the progress and success of a CAP. Questions to consider when evaluating impact include:

- Did the activity accomplish what it was supposed to (i.e., have we achieved compliance)?
- Which activities worked well? Which activities did not?
- Should the corrective action activity continue?

Submit CAP Progress Report

The CAP Progress Report is due to the MDE on a timely basis. The schedule for progress report submission and sample progress reports are available on the CIMS Web site.

The MDE will review all progress reports for evidence of progress and accept the reports. Locals will be contacted by the intermediate school district (ISD) monitor or technical assistance provider if any concerns are identified.

Request CAP Closeout, including Evidence of Correction

When requesting closeout of a CAP, locals must submit evidence that activities outlined in the CAP have been completed and that policies, practices, and/or procedures have been implemented to correct all noncompliance (student-level and systemic). Sample forms and instructions for requesting a CAP closeout are available on the CIMS Web site.

Verify Correction of Noncompliance

Once a local 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 local has corrected each individual case of noncompliance; and
- *Prong 2:* The local 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 monitors, 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

Based on this review, the MDE will establish that the local 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 local, close the CAP, and issue a closeout report or letter in the next *Workbook*.

Uncorrected Noncompliance

If correction of noncompliance is not completed before the *Workbook* due date, the MDE, in consultation with the ISD, will mandate technical assistance, training, or other enforcement action to promptly bring the local into compliance.

A finding remains active until closeout is verified by the MDE.

Results and Improvement

If a local has not met a results indicator target, it is suggested that the local convene a RAP team and complete a Results Transmittal in the CIMS *Workbook*. Locals will be informed of their data in the Strand Report.

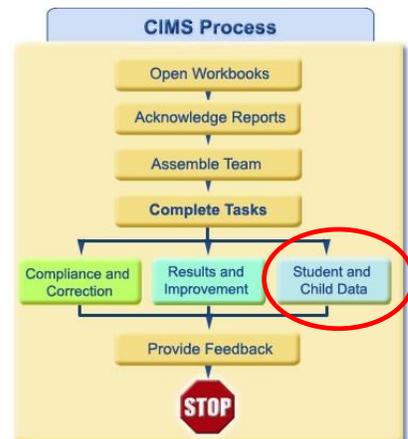
In order to complete the Results Transmittal, local RAP teams discuss the problem and identify its root cause. RAP teams answer a series of probe questions that are designed to identify: (a) why a local has failed to meet the indicator target, and (b) what changes can be made to move toward meeting the goal.



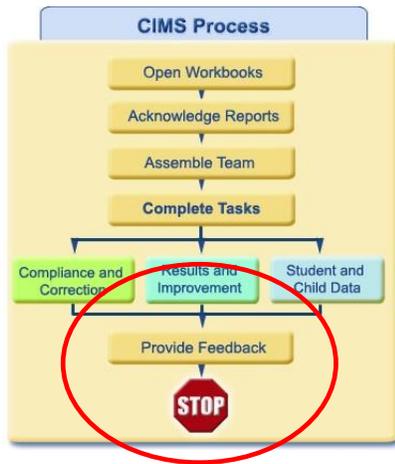
Achieving meaningful improvement on results typically requires buy-in from the entire building/district improvement team—not just special education. Therefore the Results Transmittal process is structured as a collaborative planning effort between special education and the building/district improvement team or Local Interagency Coordinating Council (LICC).

Student and Child Data

In addition to addressing SPP indicators, locals may be asked to verify or validate data. Specific directions on how to complete student and child data activities are provided to locals through the CIMS *Workbook* as needed.



Provide Feedback



The Feedback Form is a series of questions designed to help the CIMS Team identify the strengths and weaknesses of the CIMS process. Once all required CIMS tasks are completed, a Feedback Form is created in the CIMS *Workbook*. User input is essential and each form is reviewed by the CIMS Team.

After locals complete the Feedback Form, the *Workbook* will be automatically closed.

Chapter 4

Review and Analysis Process Teams

The RAP team engages in correction and improvement planning activities using the reports and tools provided in the *CIMS Workbook*. The RAP team is responsible for reviewing and analyzing local data to:

- Gain an understanding of strengths and challenges
- Prioritize the underlying concerns
- Identify the root cause of the problem. For example: Could the issue be the result of poor communication between staff? Could it be a result of a data entry error or problems with reporting?

The RAP team provides oversight, guidance, and structure in the improvement planning process. The teams write CAPs and monitor the implementation and effectiveness of those plans through progress reports and team updates.

Membership

The membership of a local RAP team will vary depending on the *Workbook*, the identified areas of concern (who is needed from the local to respond to findings), and the reports issued in the *Workbook*. RAP teams may have between 5 and 12 members. Membership may fluctuate during the year, and must include members who can provide information related to the findings or areas of concern.

The RAP team is formed and led by a RAP team leader. The team should include a sufficient number of individuals with program expertise to answer questions about data, policies, procedures, and practices, but not be so large that the group becomes unmanageable.

A Part B RAP team may include:

- CIMS coordinator or designated CIMS administrative representative
- Special education teacher(s) and/or service provider(s)
- School Improvement Team representative
- General education teacher(s) and/or administrator(s)

- Parents of students with disabilities receiving Part B services
- Other program specialists such as data experts

ISD planners/monitors or designees can assist with facilitation of the RAP team meetings and can be used as a CIMS process resource.

A Part C RAP team may include:

- CIMS coordinator or designated administrative representative
- Service provider(s)
- Parents of children under 12 who have received Part C services
- Other program specialists such as data experts

Early On Training and Technical Assistance (EOT&TA) staff and ISD monitors can assist with facilitation of the RAP team meetings (if the local feels an outside facilitator is necessary) and can be used as a CIMS process resource.

It is possible that different expertise will be required for different meetings. RAP teams may invite experts to join their meetings on an as-needed basis to address specific areas of concern.

Schedule

A variety of meeting venues or methods can be used to convene a RAP team, including in-person meetings, online meetings (webinars), and teleconferences. The schedule will vary depending on the activities indicated in the *Workbook*.

Team Member Roles and Responsibilities

Managing the RAP team process is the responsibility of the RAP team leader. Typically, the RAP team leader is the local CIMS coordinator—often the special education director for Part B or the *Early On* coordinator for Part C. However, the local may also designate an administrative representative to form and lead the RAP team.

The RAP team leader is responsible for forming the team, scheduling meetings, leading the meetings, and documenting the results of the meetings.

RAP team members play an important part in the review and analysis of a local's performance. The results of a RAP team's deliberations can contribute to the success of a local's special education and *Early On* programs and highlight areas where improvements can be made.

RAP Team Roles and Responsibilities

Roles	Responsibilities
RAP Team Leader	<ul style="list-style-type: none">• Schedule the meeting• Establish content and desired outcomes/determine meeting processes• Determine appropriate attendees and assign roles• Prepare/gather/distribute materials• Handle logistics• Issue an agenda• Kick off the meeting positively• Always maintain a tone of respect• Take notes/summarize points; make sure that everyone understands completely• Follow up on unresolved issues, and discuss any misunderstandings with team members. Be available to clarify comments or questions team members may have• Brief others as appropriate. If representing a stakeholder group, be prepared to offer a meeting summary if requested• Complete any assigned action items

Roles

Responsibilities

RAP Team Members

Contribute expertise and participate in discussions and decision making

- Contribute information
- Keep the discussion at the right level of detail for the goals of the meeting
- Discuss any major issues with leader before meeting
- Be positive; be proactive; state position
- Listen to all team members, contribute, and stay on the subject
- Avoid being personal; acknowledge the competence of others
- When convinced of a new view, say so
- Help the group work well together
- Explain any acronyms or other technical terms so all members understand your message

Part B Facilitator/Intermediate School District (ISD) Monitor (when an outside facilitator is necessary)

- Facilitate discussions
- Help guide the group in making corrective action and improvement planning decisions

Part C Facilitator/EOT&TA Representative (when an outside facilitator is necessary)

- Facilitate discussions
- Help guide the group in making corrective action and improvement planning decisions

Appendix for RAP Teams

RAP Team Leaders Q & A

Leading a meeting can be a challenging task. The subject matter may be complicated, participants may have difficulty reaching a consensus, or personality conflicts may exist within the group. This guide will help you understand common meeting dynamics and provide you with tips to keep your meeting on track.

1. My team members have never worked together. How can I set the tone for cooperation right from the start?

When working with groups, it is often beneficial to set “ground rules” prior to starting your meeting. These ground rules give the team a common bond and help establish the tone for how meetings will be run.

Sample ground rules:

- 1) Show up on time and be prepared.
- 2) Listen respectfully and acknowledge other viewpoints as valid.
- 3) Allow only one person to speak at a time.
- 4) Be brief, say what is essential.
- 5) Place greater emphasis on the good of the group rather than on personal preference or need; speak to the big picture.
- 6) Remember that others really do see the world differently from you.
- 7) Focus on behaviors and problems, not on personalities.
- 8) Consider conflict as a necessary stage along the path of progress.
- 9) Look for ways to enlarge the pie instead of worrying about how big your piece is to be.
- 10) Maintain team/group integrity and confidentiality.
- 11) Give the meeting leader/facilitator the power to interrupt, maintain order, and keep the group focused on the stated goals.
- 12) Hold your team accountable.

2. I am having trouble getting members of my team to participate in team discussions. How can I encourage them to engage in the conversation?

Start the meeting with an ice-breaker. This allows members to know each other and know their role on the team.

Use leading questions. Asking questions that help people express their ideas and draw people out encourages discussion. Consider using leading questions such as:

- What is your reaction to....?
- How do you feel about...?
- What is your thinking on...?
- What brings you to conclude that...?
- What are some other ways to get at...?

Take a survey. You can stimulate discussion through activity. Start by asking for a show of hands. Follow up by calling on individual team members and asking them to describe why they do or do not support a specific action.

Share your feelings. Engage team members by taking the lead. Share your opinion and encourage others to comment on your position.

3. My team members seem distracted. Why won't they listen?

Capturing and maintaining the group's attention is a crucial part of arriving at sound decisions. Unfortunately, distractions are a common problem and may occur for many reasons. Use the following tips to help keep your team members engaged in the discussion.

Problem: The issue is emotionally charged and/or uncomfortable to discuss. Team members choose to disengage from the conversation rather than risk a confrontation.

Solution: Try and diffuse the emotional charge by bringing the conversation back to the facts. Remind team members that you value their input and that reaching a consensus is an important part of the analysis and improvement process.

Problem: Team members are not following the discussion because they are busy planning what they want to say next.

Solution: Keep the conversation on point by summarizing what your team members have to say. Often, when members are busy thinking ahead, they lose track of the current discussion.

Politely reinforce the topic, and ask your members to specifically address that issue.

Problem: Team members appear to be daydreaming.

Solution: Engage members by asking for their opinion. Bring them back to the discussion by restating the last point made, and asking for their opinion.

4. **I’m having trouble facilitating the team.**

Managing group dynamics is often the single most difficult aspect of facilitating a meeting. Use the following tables to help understand and improve communication among team members.

Meeting Issue	Role of Facilitator
One participant talks more than any other participant	<ul style="list-style-type: none"> • Help direct the conversation to generate other options from other participants, “That’s an interesting point; now let’s see what the group thinks.” • Don’t embarrass the participant or be sarcastic. Be neutral.
Participant refrains from contributing—does not engage	<ul style="list-style-type: none"> • Be natural and friendly. • Ask questions requiring an answer beyond yes or no. • Position yourself near the person so that they feel they are talking to you and not the whole group.
Participant not understood; ideas are not clearly communicated	<ul style="list-style-type: none"> • Help the conversation along, “Let me see if I understand you correctly.” Then summarize the concept expressed • Check with participant to make sure you summarized correctly, “Did I capture your point accurately?”
Inaccurate comment	<ul style="list-style-type: none"> • Handle delicately so as not to embarrass participant, “I’m wondering if there is another thought about this.” • State authority for correct information.
Topic and points lost in extra verbiage	<ul style="list-style-type: none"> • Thank participant for information, restate relevant points and move on. • Smile in a friendly manner, state the point is off topic, and note that there is a lot of information yet to cover. • Utilize a “parking lot” for issues that require more discussion at a later time.
Takes position and defends it without consideration of others’	<ul style="list-style-type: none"> • Interject a, “Thank you for sharing” at a pause.

Meeting Issue	Role of Facilitator
point of view	<ul style="list-style-type: none"> Remind participant that the purpose of the RAP is to gather information from as many points of view as possible. Survey the other participants for contributions to the topic.
Two or more participants clash or the group becomes divided into factions	<ul style="list-style-type: none"> Emphasize points of agreement and minimize disagreements to the greatest extent possible. Draw attention to the objectives of the meeting.
Unrelated side conversations in a group	<ul style="list-style-type: none"> Don't embarrass them. If you are moving around the room, stand near them. Call on one of the people in the side-bar conversation, repeat the last remark made by the group, and ask for their opinion.

5. My team seems prone to conflict, making it difficult to reach a consensus on important issues. How can I effectively manage conflict and make our meetings more productive?

Most conflicts can be handled effectively by using clear, positive communication and addressing the following points:

- **Post the agenda and identify purpose of the meeting.** Conflict may develop because participants have different levels of understanding in terms of the meeting's objectives. Put the agenda on a wall chart and identify the purpose of the activity.
- **Strive for understanding.** Often, when involved in a disagreement, people do not listen carefully to the opposition's point of view. You may need to stop the action and make sure you can articulate all points of view.
- **Focus on the data.** Although emotional involvement is a natural part of confrontation, sound decisions may not be reached if participants are too emotional. For the benefit of the outcome(s) keep attention focused on data considerations—facts, supporting reasons.
- **Generate alternatives.** Brainstorm alternative solutions that address the needs of everyone involved. Participants often cannot see how another alternative to their solution exists. Other group members not tied to the conflict may generate reasonable alternatives.
- **Table the issue.** Tabling or placing a topic in a "parking lot" can be effective when people need time to consider the arguments presented, or if emotions are too high to deal with an issue. This may also allow time for someone to gracefully retreat from a heated position.

- **Use humor.** Proper use of humor can reduce the emotional tension of confrontation and can serve as a release to clear the way for more rational problem solving.
- **Use a third party to facilitate.** Using a neutral party may be helpful. Consider asking your Intermediate School District (ISD) monitor (Part B) or *Early On* Training and Technical Assistance (EOT&TA) representative (Part C) to help you facilitate your RAP team meeting. The presence of an external person can have a positive effect on the RAP team behavior.

Sample RAP Team Member Invitation Letter

[USE LOCAL LETTERHEAD]

Date

Dear :

This spring, the (ENTER NAME OF LOCAL SCHOOL DISTRICT OR SERVICE AREA) will begin its Continuous Improvement and Monitoring System (CIMS) process for monitoring special education and *Early On*[®] performance and outcomes. This letter is to request your participation in the process and invite you to join our Review and Analysis Process (RAP) Team.

As a member of the RAP Team, you will play an important role in the review and analysis of (ENTER NAME OF LOCAL SCHOOL DISTRICT OR SERVICE AREA) outcomes and performance. We will use data provided by the Michigan Department of Education, along with other sources, to evaluate success in meeting the requirements of the *Individuals with Disabilities Education Act* of 2004 (IDEA). Your knowledge of and involvement in special education or *Early On* will be an asset to our team.

Please contact me at XXX-XXX-XXXX to discuss your role in greater detail. I look forward to having you as part of our team.

Sincerely,

X

(ENTER NAME OF LOCAL SCHOOL DISTRICT OR SERVICE AREA) CIMS
COORDINATOR OR EARLY ON COORDINATOR

RAP Team Meetings Checklist

Part 1: Overall Success Factors

Be prepared. Establish a goal for each meeting, and provide your meeting participants with enough information to come prepared to achieve that goal at your meeting. Plan a workable sequence of activity with the right balance of off-line versus in-meeting work.

Set expectations up front. The Review and Analysis Process (RAP) takes time and introspection. It can be tedious and confusing at times. If team members are fully aware of their responsibilities and are committed to being properly prepared and arriving ready to participate in meetings, the process will run much more smoothly.

Articulate the desired objectives and outcome of each meeting in concrete terms. At the end of the meeting you should be able to tell whether the objective was achieved or not.

Get people properly prepared. Take responsibility for getting the appropriate materials to your team members, giving time for preparation, reminding them, etc. Suggest that your RAP team members take advantage of the *Michigan Virtual University*[®] (MVU[®]) CIMS training, or provide them with background information on the CIMS process. Encourage them to log on to the CIMS Web site for additional resources.

Use the right process and the proper tools in your meeting. Have your files, Strand Report, and tasks and activities organized and ready for reference.

Manage people during the meeting. If necessary, ask your ISD monitor (Part B) or *Early On* Training and Technical Assistance (EOT&TA) representative (Part C) to assist you in running the meeting. Anticipate that there will be disagreements, and possibly even conflicts, between the members of your team. It is important to understand that not all issues will be resolved in one meeting and that resolving a disagreement on how to handle a sensitive issue (such as rules and regulations, or the accuracy of certain types of data) may require additional research and input from sources other than the RAP team.

Part 2: Getting Ready for Your Meeting

Determine attendees. Give your team members as much advance notice as possible. Suggested team members include:

Part B:

- CIMS coordinator or designated CIMS administrative representative

- Special education teacher(s) and/or service provider(s)
- General education teacher(s) and/or administrator(s)
- At least two parents of students with disabilities receiving Part B services
- Other program specialists such as data experts

Part C:

- CIMS coordinator or designated administrative representative
- Service provider(s)
- At least two parents of a child receiving Part C services
- Other program specialists such as data experts

Have a meeting objective. The overall objective of the meeting will determine what preparation is necessary and what materials are needed at the meeting. For example, if this is an orientation meeting, then you might want to plan to address team expectations, privacy issues, etc.

Issue an agenda. One to two weeks prior to the meeting, issue an agenda outlining the topics you plan to address at the meeting. If possible, provide participants with background documentation at this time so they can come to the meeting prepared to ask questions. If you have agenda items that may require expertise or clarification beyond the purview of your RAP team members, be sure to invite those experts to your meeting.

Do your homework. Now is the time to compile the background materials you will need to assure that your meeting is productive. Be sure you have adequate access to rules/regulations, if necessary. Make enough copies of documents so each member of your team has a copy.

Part 3: Running the Meeting

Establish roles and responsibilities. Understanding roles and responsibilities promotes productivity and helps new teams work together effectively.

Take notes! The RAP team leader is responsible for taking notes (or assigning someone to take notes) and summarizing the team's analysis. Because the team's analysis is ultimately entered into the CIMS *Workbook*, it is important to *succinctly* capture the group's analysis. For this reason, it may be useful to take one set of notes during the meeting and then plan to summarize those notes when making *Workbook* entries. Provide your team members with a copy of the meeting summary.

Encourage discussion. All team members should participate in the discussion. Your role as the RAP team leader is to engage the group members in meaningful discussion and to help them arrive at conclusions. Expect your team to disagree as they wrestle with difficult concepts. Recognize that some questions cannot be

answered without additional information and be prepared to document and table those discussions.

Part 4: Closing the Meeting

Get closure. Clarify items as the meeting progresses, and try to resolve items before moving on to new agenda items. At the end of the meeting, review all action items and ensure that

- if follow-up is required, a single individual is responsible for action; and
- there is an established completion date for all action items.

Provide a wrap-up. Give a final summation of the meeting results and be prepared to issue a meeting summary.

Set your next meeting date. Discuss the need for additional meetings and schedule them, if possible.

Thank your team! Leave on an upbeat, energized note.