

## TARGETED STRATEGY PLAN—MCD OUTCOME 18

### INTRODUCTION

The following strategies will be used to target the barriers to achievement of Outcome 18:

**CONTINUED Strategy 18-1: Continue to provide professional development on the requirements for comprehensive evaluation, including clarification of District policy regarding the requirements, for students considered for the eligibility of ED.**

**REVISED Strategy 18-1.1:** *Continue training of APEISs, designated secondary administrators, bridge coordinators, nursing coordinators, least restrictive environment (LRE) specialists, program specialists, MCD Review Teams, and charter and nonpublic school administrators in use of the criteria checklist for conducting comprehensive evaluations of students considered for the eligibility of ED.*

**REVISED Strategy 18-2: Establish a new list of targeted schools based on evident weaknesses related to the evaluation components including (a) pre-referral and referral intervention requirements, (b) documentation of student interventions for students initially referred and students already receiving special education services, (c) all aspects of the assessment, and (d) parent attendance at the IEP meeting—including alternative forms of attendance (e.g., teleconference)—using professional development of school psychologists, administrators, bridge coordinators, nursing coordinators, least restrictive environment (LRE) specialists, program specialists, MCD Review Teams, and charter and nonpublic school administrators as the primary intervention.**

**REVISED Strategy 18-2.1** *Identify the schools that have (a) evidenced difficulty in complying with the required components of the comprehensive evaluation process, and schools that have (b) high numbers of African American students (if they also have comprehensive evaluation compliance needs) for additional training and support for implementing of pre-referral interventions, including procedures for documentation, prior to consideration of an eligibility of emotionally disturbed.*

**CONTINUED Strategy 18-3: Provide supports to targeted schools for expanding their capacity to serve African American students identified as emotionally disturbed in their home schools and in general education classrooms.**

**CONTINUED Strategy 18-3.1:** Provide supports appropriate to targeted school needs for serving African American students identified as ED in their home schools and in general education classrooms.

**CONTINUED Strategy 18-4: Maintain a systematic case review (also known as “peer” review) committee process for all cases of students suspected of having a disability of emotional disturbance.**

**CONTINUED Strategy 18-4.1:** Continue a systematic case review committee process as initiated in 2006-2007 for all cases of students suspected having a disability of emotional disturbance.

**ADDED Strategy 18-5: Analyze data to identify issues and target interventions for school and support staff to uniformly apply the criteria for comprehensive evaluations when considering the eligibility of ED.**

**CONTINUED Strategy 18-5.1** *Provide itemized data on the comprehensive evaluation for ED regularly to staff meetings of APEISs, designated secondary administrators, bridge coordinators, school psychologists, nursing coordinators, support unit staff, MCD review teams, and charter and nonpublic school administrators.*

**ADDED Strategy 18-5.2: Distribute and review Bulletin 4182, “Parent Participation at Individualized Education Program (IEP) Meetings for Students Suspected of Having Emotional Disturbance (ED)” with appropriate non-public school administrators.**

**ADDED Strategy 18-6: Collaborate with the Support Units in developing viable middle school and high school programs for students with an ED eligibility on general education sites.**

**ADDED Strategy 18-6.1: Collaborate with the Division of Special Education’s Director of Program/Fiscal Accountability, School Utilization and the Support Unit Administrators to identify available space on general education sites for secondary students with an ED eligibility.**

These primary strategies have been determined based on an analysis of data collected by the Division of Special Education, Psychological Services Department, on students identified as Emotionally Disturbed in the LAUSD during 2006-2007 and 2007-2008. The analysis includes (a) numbers of students identified as ED by ethnicity over five quarters spanning a portion of 06-07 and all of 07-08, (b) a comparison of the number of African Americans identified as ED during 2006-2007 with 2007-2008, and (c) inclusion of OIM data spanning 2004-05, 2005-06, 2006-07 to 2007-08, years 2 through 5 of the MCD, which illustrates the District’s upward trend on meeting the Outcome 18 benchmark. Other components of the analysis include comparisons among Support Units and Nonpublic Schools (NPS) of the presence of comprehensive evaluation components of students identified as ED. Other factors that were considered are (a) recommendations by an advisory group of experts, consultants, and community partners relative to the outcome, and (b), a review of the impact of particular action steps from the prior annual plan or plans.

## PERFORMANCE

Outcome 18 requires that 90% of African-American students identified as emotionally disturbed (ED) will meet all of the requirements of a comprehensive evaluation as defined by the Independent Monitor. The Office of the Independent Monitor determined through its 2007-2008 study that the District achieved 70.2% as the percentage of African-American students identified as ED with all required elements of a comprehensive evaluation. This was approximately twice what the District had achieved in 2006-2007. The Independent Monitor indicated in his end-of-the-year report<sup>1</sup> that levels of compliance with parent participation at the IEP meeting continue to hamper meeting the benchmark of Outcome 18. The OIM report also recommended that targeting non-public school providers would further benefit the District.

Over the 2007--08 school year, the cases of students identified as ED were examined by Division of Special Education’s Psychological Services staff to determine the presence of required components of the comprehensive evaluation. There was a careful attempt to examine all students identified as ED within 2007-08, beginning July 1, 2007 through June 15, 2008. In this report, the operational definitions of the terms “2007-2008 School Year,” and “2007-2008 Summary” refer to the July 1, 2007-June 15, 2008 timeframe.

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<sup>1</sup> Report on the Progress and Effectiveness of the Los Angeles Unified School District’s Implementation of the Modified Consent Decree 2007-2008, Part I, Office of the Independent Monitor, October 1, 2008.

## Method of Case Examination

**Monitoring Device.** The *Comprehensive Evaluation Process*<sup>2</sup> is composed of four sections that are summarized below:

1. Review of Pre-Referral and Referral Intervention for students initially referred
  - a. Documentation of pre-referral intervention meeting
  - b. Documentation of a follow-up meeting (at least 3 months after the first meeting)
  - c. Parent participation at the pre-referral intervention meeting
  - d. Other considerations: attendance history; recent changes in home environment, primary language, etc.
  - e. Reported behavioral concerns for at least one semester to one year prior to referral
  - f. Counseling, not related to an Individualized Education Plan (IEP), behavior support plan, participation in school-wide discipline program
  - g. Assessment plan indicating behavioral concerns
- For students already receiving special education services
  - a. Behavior support plan examination
  - b. Academic modifications and accommodations
  - c. Considerations for counseling services and/or referrals to school-wide discipline programs
  - d. Assessment plan indicating behavioral concerns
2. Assessment components
  - a. Health assessment
  - b. Formal academic and consideration of curriculum based assessments
  - c. Cognitive assessment identifying student's strengths and weaknesses
  - d. Multi-disciplinary and multi-setting social-emotional evaluation
  - e. Comprehensive behavioral evaluation
3. Determination of ED disability
  - a. ED eligibility statement per IDEA regulations
  - b. Consideration of exclusionary factors
  - c. Justification of additional disabilities (other than ED)
4. IEP Team Recommendations and/or Considerations
  - a. Consideration of a Behavior plan
  - b. Placement in the least restrictive environment

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<sup>2</sup> See Appendix, *Comprehensive Evaluation Process, Outcome 18: Disproportionality*, Office of the Independent Monitor.

- c. Designated Instructional Services (DIS) counseling considered
- d. Counseling goals if appropriate
- e. Parent participation—including alternative forms of attendance (e.g., teleconference)—at the IEP meeting that determines eligibility and placement

Each aspect of the *Process* has implications for a student meeting criteria for the ED disability, and for the type of services received.

***Utilization of Monitoring Device (Comprehensive Evaluation Process).*** The Case Review (Peer Review) process that was initiated in 2006-2007 utilized the Monitoring Device when reviewing cases of students suspected of ED. The Case Review is facilitated and supervised by Psychological Services Specialists and was created as a process for school psychologists to meet to discuss cases that are suspected of ED and other severe disabilities.

To achieve Outcome 18, the District must ensure that comprehensive evaluations are completed for students suspected of ED. The purpose of the Case Review process is to monitor individual cases for compliance with federal and State law and with the Comprehensive Evaluation Process approved by the Independent Monitor. Case reviews are to be conducted before the IEP team meeting. If there are additional assessments or steps necessary for all components of the comprehensive evaluation to be completed, the school site is notified so that the appropriate follow-up action can take place.

The Case Review process is designed to assist schools in taking the necessary steps and gathering the necessary information to make decisions regarding students suspected of ED. It does not change who has the authority to determine ED eligibility. Nor does it change who develops the individualized education programs. These responsibilities rest with the IEP teams.

The following results are a compilation of data records that include students initially identified as ED and students already receiving special education services whose disability was changed to ED. Also included are students who are ED who received a comprehensive evaluation generally as a result of a triennial review. Data collection ranged from July 1, 2007 through June 15, 2008.

***Limitations.*** These data represent a determination of whether or not the required evaluation component was present in the students' psycho-educational case files, in order to determine trends that may necessitate professional development and mentoring if the evaluation components were absent. Therefore, the data are subjective within the limitations of how the monitoring device (or rubric) was utilized. When possible, as mentioned earlier, the data are compared with the studies done 2004-2005 through 2007-2008<sup>3</sup> conducted by the Office of the Independent Monitor (OIM). Comparisons between data sources can assist in following trends

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<sup>3</sup>Study on the Disproportionate Identification of African-American Students as ED in LAUSD-Year Three, Office of the Independent Monitor, Revised August 23, 2006

<sup>4</sup> Study on the Disproportionate Identification of African-American Students as ED in LAUSD-Year Four, Office of the Independent Monitor, September 12, 2007

<sup>5</sup>Study on the Disproportionate Identification of African-American Students as ED in LAUSD-Year Five, Office of the Independent Monitor, September 30, 2008

on a monthly basis, thereby targeting interventions based on issues evidenced in the data. Also, as mentioned earlier the total number of students identified as ED constitutes the ED students from July 2007 through June, 2008.

**Number of Students Identified As ED**

Data in Table 1 indicate that total numbers of students of all ethnicities have decreased. The Other category contains White, American Indian or Alaska Native, Asian, Pacific Islander, Filipino. These are monthly data collected from the Welligent system by the Psychological Services Department, Division of Special Education.

Table 1: Students Identified as ED over 5 Quarters, January 2007 – June 2008

Ethnicity	06-07 Jan-Apr	06-07 Apr-Jun	07-08 Jul-Jan	07-08 Feb-Apr	07-08 Apr-Jun
African American	83	39	71	46	70
Latino	122	77	85	90	95
Other	268	118	53	42	61

Decrease in the number and percentage of African American students is also noted between the 2006-07 and 2007-08 school years, as seen in Table 2. These figures are obtained from monthly data collected by the Division of special Education, Psychological Services department. They represent students newly identified as ED and students who kept their ED disability at the triennial review.

Table 2: African American Students Identified as ED During 2006/07-2007/08

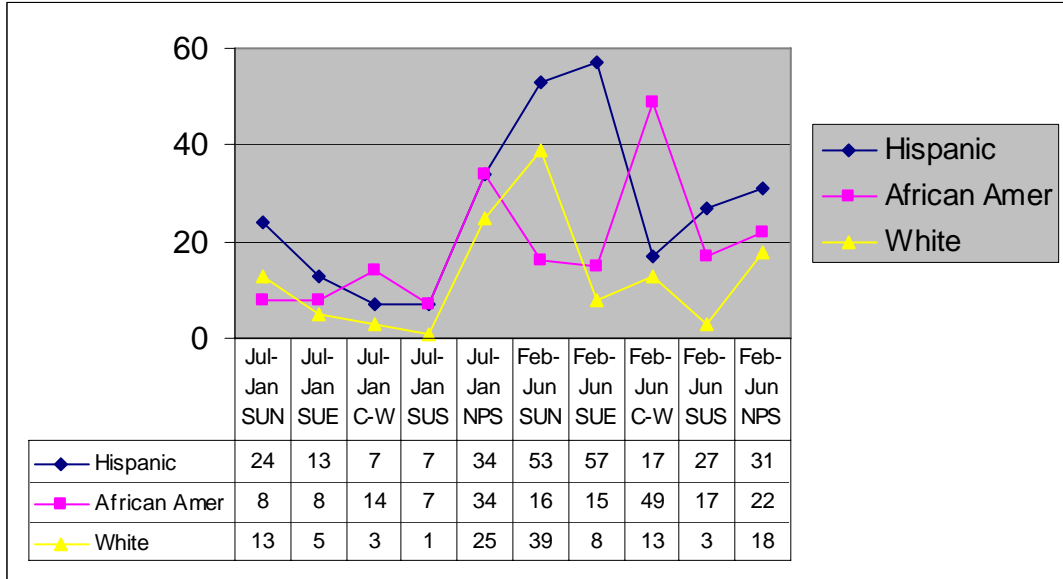
Ethnicity	2006-2007	2007-2008	Percent Decrease
African Americans	229	187	18

Figure 1 offers comparisons among support units and nonpublic schools of numbers of students disaggregated by ethnicity identified as ED during 2007-08. It should be noted that data from the OIM sample and the data from the Psychological Services, Division of Special Education do not differ significantly. The trends of and actual percentages of both data sets are comparable. Using the OIM study as a comparison tool is helpful in determining trends that require more professional development and mentoring in (a) documentation, and (b) implementation and documentation. Further comments on these findings are provided.

## 2007-2008 Summary

### Total ED Identified: Support Units & NPS

Figure 1



### Presence of Comprehensive Evaluation Components for all Students

The District's progress for all ethnicities in achieving the benchmark in Outcome 18 is illustrated in Table 3. The benchmark for achieving Outcome 18 is 90% for African Americans, and given the rate of progress the trajectory is aimed toward a successful completion of the Outcome. Again, while overall numbers of students identified as ED have decreased, over the course of the last four years, Table 3 indicates that there has been a significant increase in the use of the comprehensive evaluation process for students suspected of ED and for students already receiving special education services.

Table 3: Numbers & Percent of Students Identified as Emotionally Disturbed With a Comprehensive Evaluation

	2004-05	2005-06	2006-07	2007-08
Ethnicity	n	n	n	n
	%	%	%	%
African Americans	73 8%	174 25.3%	190 50.5%	181 70.2%
Latino	119 3%	206 35.4%	262 55.3%	200 78.0%
White	45 4%	105 33.3%	145 51.7%	128 85.9%

Table 3 data were obtained from OIM studies from reports dated, August 23, 2006, September 12, 2007, and September 30, 2008.<sup>3,4,5</sup>

The frequency of compliance of required criteria achieved in each support unit and NPS disaggregated by the broad components of the comprehensive evaluation process is illustrated in Figure 2.

### 2007-2008 Summary

### Percent with Comprehensive Evaluation Components Support Units & NPS

Figure 2

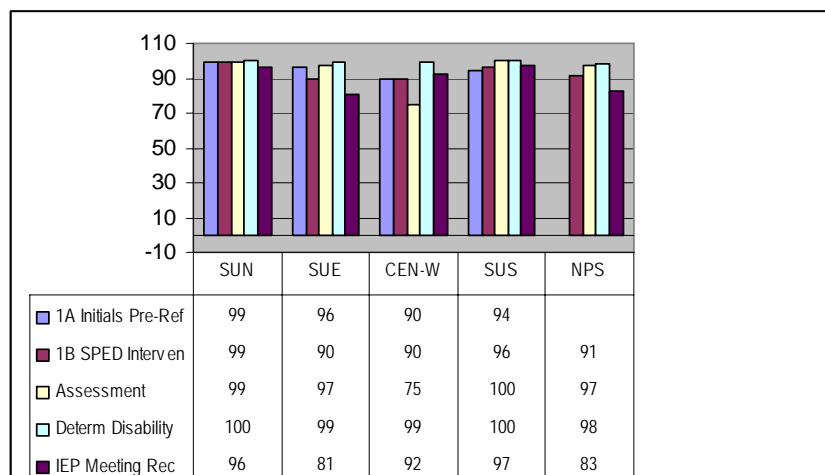


Chart Terms:

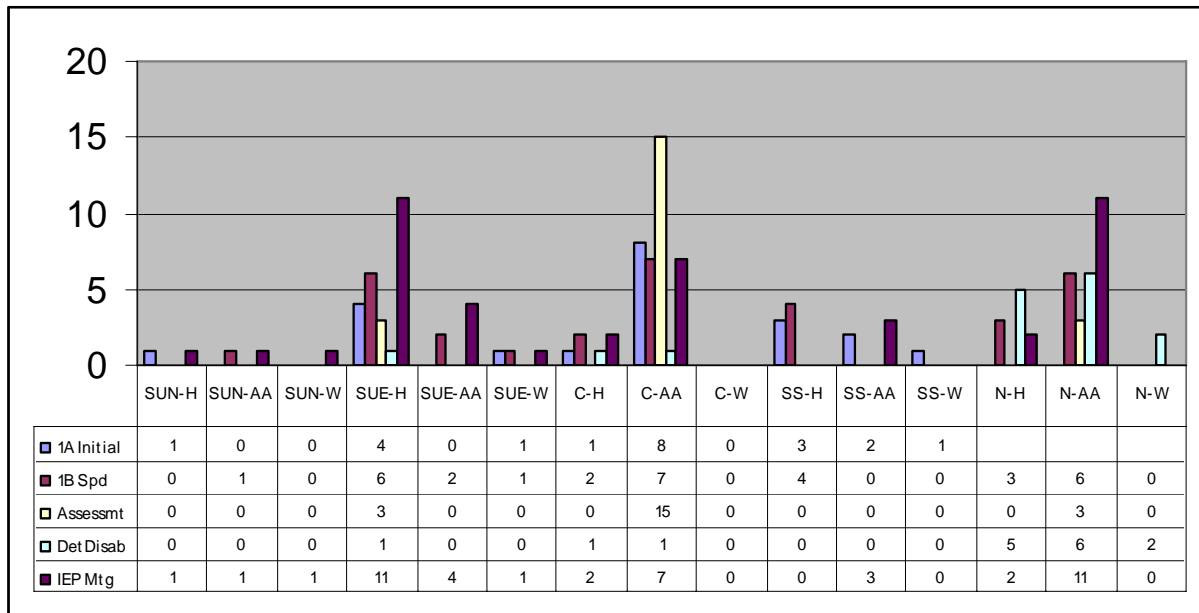
1A Initials Pre-Ref: Pre-Referral and Referral Intervention for students initially referred;

1B SPED Interven: Students already receiving special education services;  
 Assessment: Assessment components;  
 Determin Disability: Determination of ED Disability; IEP Meeting Rec:  
 IEP Team Recommendations and/or Considerations

More specific information regarding how various ethnicities in the support units and NPS achieved compliance in the major comprehensive evaluation areas is found in Figure 3

### 2007-2008 Mapping of Comprehensive Evaluation Needs Support Units and NPS

Figure 3.



Abbreviations Key: SUN: Support Unit North; SUE: Support Unit East; C: Support Unit Central West; SS: Support Unit South; N: NPS; H: Hispanics; AA: African Americans; W: White

#### Summary of Compliance of the Required Components

Overall, among all ethnicities, there appeared to be high rates of compliance within each of the major areas as summarized in Figure 3, which maps the small number of occurrences in each major area where a component was not compliant.

Figure 4 in the Appendix depicts the 2007-2008 summary of the comprehensive evaluation components with itemization of each of the 24 components spread across the five major areas of the comprehensive evaluation process., disaggregated by ethnic group. Since African American students were the focus of Outcome 18, monthly data gathering always included ethnic breakdown in order to clearly illustrate the presence of the comprehensive evaluation

components in the evaluations of this population. While there are some differences in the actual numbers for each of the elements across the different analyses, the trend patterns remained relatively the same. In some cases when a support unit evidenced less than 90% compliance, it was caused by a very small number of noncompliant elements—more frequently as little as one—within an overall small total number of evaluations.

### **Summary of Findings**

Improvements meeting comprehensive evaluation requirements over the 2006-07 school year are significant. As mentioned earlier, the comparisons of data collected by the psychological services department within the special education division and the study conducted by the Office of the Independent Monitor (OIM) trend in the same way among ethnic groups, with slight percentage differences. In some cases the OIM results show somewhat higher rates of noncompliance, and in other cases the District results indicate higher rates.

***Pre-referral and Referral Interventions – Initials.*** Gains have been achieved in 2007-08 indicating overall compliance. Specific noncompliant elements that were noted at least 2 times within one unit included (1) the follow up meeting in the pre-referral process; (2) consideration of behavioral or academic concerns for more than one semester or year prior to making the referral, and (3) an assessment plan indicating behavioral concerns.

***Pre-referral and Referral Interventions/Already Receiving Special Education Services.*** Difficulties in this compliance section include (1) behavior support plan, (2) consideration of counseling; and (2) an assessment plan that indicates behavioral concerns. District and OIM data found that behavior support plan consideration was an area of weakness,

***Assessment and Determination of ED Eligibility.*** Compliance in these major areas continues to improve, yet mapping indicates where specific compliance needs reside. In the assessment areas, weakness was observed were in the areas of (1) health evaluation and, (2) formal academic assessment. The consideration of exclusionary factors and the justification of co-morbidity were areas of noncompliance when ED eligibility was determined.

***IEP Team Recommendations.*** The required components of IEP team recommendations indicate parent participation/attendance at the IEP team meeting continues to be a weak compliance area. Data results are further influenced by the smaller numbers of students being considered for an eligibility of ED, frequently resulting in falling below the benchmark as a result of this area of noncompliance.

***Additional Considerations.*** The differences in data sets between LAUSD and the OIM may be explained by the fact that the OIM used a sample that included all initials and a sample of reevaluation, whereas the District followed all initials, all triennials, and all cases where the disability was changed to ED. Also, the OIM sample included charter school data which may have contributed to data differences.

Areas for the District to address through targeted professional development in 2008-2009 include:

- Parent attendance—physical, as well as alternative forms of attendance (e.g., teleconference)—defined as the parent's attendance at the IEP meeting.
- Other indications of behavioral concerns as a reason for the assessment must be written in addition to the Assessment Plan indicator.

- CUM folder and IEP data must be carefully documented in the process for reviewing and documenting comprehensive evaluation elements relative to the criteria.
- Providers essential to all aspects of the comprehensive evaluation process must (a) receive regular data on weak areas, and (b) meet regularly to discuss progress. These providers must include charter and nonpublic schools.

Analysis of LAUSD data placed a focus on targeted intervention, mentoring, and monitoring that will assist Support Units and schools in (1) understanding the intent and scope of intervening early with students that evidence behavioral or emotional difficulty; (2) documenting the interventions in a consistent manner on school records; (3) using a targeted approach, following the guidelines of the Student Intervention Record Form (BUL-2075); (4) contacting the parent or guardian early in the process to elicit information and include them in the intervention process, (5) use of strategies to increase parent participation at IEP meetings, following District guidelines<sup>6</sup>. (6) use of the ED Certification process and form at IEP meetings; and (7) including community resources to provide research-based guidance on the comprehensive evaluation components.

## **IMPLEMENTATION OF TARGETED STRATEGY PLAN, 2007-2008**

### **Accountability and Supervision for Comprehensive Evaluation**

Centrally assigned Psychological Services administrators conducted monthly monitoring activities in each of the four Support Units' Psychological Services departments to monitor the implementation of the required elements in comprehensive assessment reports. Psychological Services Specialists assigned to support units, who provide technical assistance to school psychologists, targeted school psychologists for additional assistance and reported progress to central staff. Monitoring visits included a review of cases for the documentation of the critical elements for comprehensive evaluation based on an evaluation process established in each Support Unit. Psychological Services Coordinators and Specialists provided training on comprehensive evaluations, technical support, and a case review (also known as peer review) process to increase the capacity of school psychologists to (a) conduct appropriate assessment areas, (b) document all components, and (c) consult with school personnel of noncompliant areas of the comprehensive evaluations in accordance with District policy.

As indicated in earlier targeted strategy plans, two primary policy bulletins were used as policy to inform school staff of the requirements of a comprehensive evaluation for all students suspected of emotional disturbance and the documentation of required actions in the implementation of interventions for students suspected of emotional disturbance. Currently, the ED Certification form used in the web-based IEP process was revised April, 2008. The revision was undertaken to ensure that intervention activities for both initially referred and students already receiving services were appropriately implemented and documented.

Another policy bulletin<sup>6</sup> was developed during 2007-2008 to assist with increasing parent attendance at IEP meetings. Finally, performance evaluations for field staff included the application of District policy for comprehensive evaluation criteria for students suspected of emotional disturbance.

## **Professional Development**

Professional development for local district and nonpublic school services staff on the components of a comprehensive evaluation for students suspected of ED was accomplished through regularly scheduled sessions with special education support unit staff, local district staff,

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<sup>6</sup>Bulletin 4182.0, *Parent Participation at Individual Educational Program (IEOP) Meetings for Students Suspected of Having Emotional Disturbance*, April 1, 2008.

psychological services staff, and nonpublic school services psychologists. The 2007-2008 professional development focused on the following critical elements:

- a. the general education responsibility in constructing learning environments that address the needs of high-risk learners;
- b. general education's role in the decision to make appropriate referrals;
- c. systematic and uniform referral procedures;
- d. documentation of the pre-referral intervention process, including the use of Student Success Teams (SST);
- e. IEP eligibility decisions in accordance with federal and state law;
- f. IEP documentation that considers exclusionary factors; and
- g. the use of the comprehensive evaluation criteria rubric when the IEP team may consider the eligibility of emotional disturbance.

Dedicated trainings of teams from targeted schools were conducted at local districts and support units, utilizing a training package developed at the central office. The trainings consisted of an in-depth look at the required components of the comprehensive evaluation process.

In 2007-2008, the Division continued to utilize personnel to assist in developing and conducting SST training. Training was conducted District wide, with targeted school teams provided follow-up mentoring on the SST process. Schools with successful practices and effective structures for appropriately addressing referrals provided input and constituted facilitation at these trainings and support to schools. Training was also provided in the academies for assistant principals and support unit staff.

### **Multi-Disciplinary Advisory Group and Use of Experts**

A multi-disciplinary advisory body composed of community, university, and Division of Special Education personnel met regularly to address current events related to disproportionality and discuss information that supported efforts to decrease overrepresentation. The advisory group provided the impetus for LAUSD to enter into a partnership with community organizations and universities resulting in the awarding of an AmeriCorps grant to serve at-risk LAUSD students to (a) increase student achievement in reading and math; (b) increase student attendance; and (c) increase parent participation at school. These factors were identified by the advisory group as critical toward achieving a goal of decreasing disproportionality.

The District continued to consult with local university partners to influence a decreasing

overrepresentation. A brief characterization of the expertise provided to the District follows consultants' names in the list below:

<b>Robert Rueda</b>	Cultural competence and quality assessments
<b>Victoria Graf</b>	Inclusive school environments and special education practices that decrease overrepresentation
<b>Barbara Wheeler</b>	Disproportionality and community involvement
<b>Brandon Gamble</b>	Mental health access

### **RESEARCH**

The intent of Outcome 18 is to decrease inappropriate referrals and identification of special education students labeled as emotionally disturbed and to institutionalize a system that results in proportionate representation in special education. According to an analysis of research, this is a multi-level process of early interventions, good instruction, sound behavioral practices, and professional development programs. The same analysis states that students who show early signs of struggling should receive supplemental, intensive instruction appropriate to their needs. One co-authored article provides guidelines related to policies and practices for referring evaluating, identifying, placing, and serving students which serve to reduce overrepresentation of students from culturally and linguistically diverse backgrounds. This comprehensive set of guidelines underscores that access to quality pre-referral services and revised assessment practices contribute to a reduction in disproportionate identification in special education. This research supports the District's use of the comprehensive assessment, including opportunities for students to receive intensive interventions prior to referral for special education, as a good strategy for changing the District culture and reducing overrepresentation of African American students as emotionally disturbed.

### **CONCLUSION**

A review of the Independent Monitor's report on Outcome 18 based on a study on the use of the criteria for comprehensive evaluation for students identified as emotionally disturbed makes clear that the District has made progress toward the achievement of this outcome during 2007-2008. This progress appears to be most probably due to school staff becoming knowledgeable of the requirements to be met in determining an eligibility of emotional disturbance following local district and support unit trainings, implementation of a revised ED certification page in the Welligent IEP, a bulletin that offers an alternative method of parent attendance at IEP meetings, targeting trainings to focus upon data determined areas of compliance needs, and Psychological Services supervisors monitoring cases in preparation for consideration of ED eligibility by IEP teams. These efforts have contributed to a decrease in the overall number of students, and specifically African American students, identified as ED.

The data from the Independent Monitor's report indicates that continuation of professional development on the requirements for comprehensive evaluation for students considered for the eligibility of ED remains a necessary strategy that would contribute to the achievement of Outcome 18. Clarification of specific requirements and procedures needs to be a part of this

continued training effort. Additional assistance and support should be provided to data identified schools that are struggling with the implementation of the requirements to increase their capacity for institutionalizing District policy and procedures regarding the determination of ED eligibility by IEP teams.

Professional development and implementation of effective pre-referral and referral intervention procedures for students with behavioral and academic issues needs to continue during 2008-2009. Appropriate interventions, particularly behavioral interventions, identified by intervention teams such as the Student Success Team (SST), and regularly reviewed for results and modifications, will lead to more students not being identified as emotionally disturbed initially and fewer students with eligibilities changed to ED. A review of the data regarding the number of students with a first-time eligibility of ED in 2007-2008 will identify those schools that will need a particular focus on establishing effective pre-referral and referral intervention procedures and practices.

Least restrictive environment options continue to remain fewer proportionately for students with the eligibility of ED than for students with the eligibility of specific learning disability (SLD). This has led to high percentages of students with an ED eligibility being placed in ED special day programs in District schools other than their home school or being placed in nonpublic schools. Schools identifying the disproportionate numbers of students as emotionally disturbed, particularly African American students, need to have the capacity to serve the students in their home school and, to the maximum extent appropriate, in the general education classroom. The targeted strategy plan for Outcome 5 will contribute to positive results in this area. However, additional training and supports will need to be provided for schools to increase options in less restrictive environments who meet the ED eligibility criteria. A strategy for increasing the capacity of these schools to serve African American students in their home school and in the general education classroom will contribute to increasing achievement of Outcome 18.

The District submits these primary strategies—continuation of professional development for school administrators, bridge coordinators, nursing coordinators least restrictive environment (L.R.E.) specialists, program specialists, and charter and nonpublic school administrators on the requirements for comprehensive evaluation, including clarification of District policy regarding the requirements for students considered for the eligibility of ED; continuation of professional development on pre-referral and referral intervention requirements, including documentation procedures, for students being considered for an eligibility of ED to psychologists, administrators, bridge coordinators, nursing coordinators, least restrictive environment (L.R.E.) specialists, program specialists, other relevant school personnel, and charter and nonpublic school administrators; regular analysis of data that specifies comprehensive evaluation component needs; and expansion of the capacity of schools to serve African American students identified as emotionally disturbed in their home schools and in general education classrooms—as key strategies that will significantly increase LAUSD's opportunity for achieving Outcome 18 and decreasing the overrepresentation of African American students identified as emotionally disturbed.

**TARGETED STRATEGY PLAN**  
**Key Strategies to Achieve MCD Outcomes**  
**2008-2009**

**Approved by the Independent Monitor November 13, 2006**

**Amended November 12, 2007**

**Approved by the Independent Monitor December 13, 2007**

**Amended November 21, 2008**

**Amendments revised and approved by the Independent Monitor January 21, 2009**

**Outcome #18: Disproportionality**—90% of African American students identified as emotionally disturbed during an initial or triennial evaluation, will demonstrate evidence of a comprehensive evaluation as defined by the Independent Monitor and consideration for placement in the least restrictive environment as determined by Independent Monitor.

<b>18-1</b>	<p><b>REVISED</b> Continue to provide professional development on the requirements for comprehensive evaluation, including clarification of District policy regarding the requirements, for students considered for the eligibility of ED.</p> <p><b>RESOURCE ALLOCATON:</b> No additional cost</p>
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**REVISED 18-1.1** *Continue training of APEISs, designated secondary administrators, bridge coordinators, nursing coordinators, least restrictive environment (L.R.E.) specialists, program specialists, MCD Review Teams, and charter and nonpublic school administrators in use of the criteria checklist for conducting comprehensive evaluations of students considered for the eligibility of ED.*

**Accountable Personnel:**

**Associate Superintendent, Division of Special Education**

- Provide training on use of the criteria checklist for conducting comprehensive evaluations of students considered for the eligibility of ED, including clarification of District policy around issues such as pre-referral interventions and documentation of interventions, LRE considerations, assessment components and parent attendance at IEP meetings, including alternative forms of attendance (e.g., teleconference).
- Continue to follow the revised ED Certification page of the IEP to include detailed information on pre-referral intervention information for students newly identified as ED to include the date and type of pre-referral interventions as appropriate.

**Local District Superintendents**

- Reinforce with principals the attendance of designated school administrators and bridge coordinators at scheduled trainings on comprehensive evaluations for students considered for the eligibility of ED.

**Principals**

- Schedule and enforce attendance of designated school administrators and bridge coordinators for trainings on comprehensive evaluations for students considered for the eligibility of ED.

**Initiation Timeline:** October 2008

**Progress Monitoring:**

Intervals	Indicators
November 2008	Training package completed
November 2008	Trainings begin
January 2008	Trainings completed

**COMPLETED Strategy 18-1.2:** *Target the schools with the highest number of African American students for additional assistance and training support for the implementation of the criteria checklist for conducting comprehensive evaluations of students considered for the eligibility of ED.*

<b>18-2</b>	<p><b>REVISED</b> Establish a new list of data identified schools based on evident weaknesses related to the evaluation components including (a) pre-referral and referral intervention requirements, (b) documentation of student interventions for students initially referred and students already receiving special education services, (c) all aspects of the assessment, and (d) parent attendance at the IEP meeting—including alternative forms of attendance (e.g., teleconference)—using professional development of school psychologists, administrators, bridge coordinators, nursing coordinators, LRE specialists, program specialists, MCD Review Teams, and charter and nonpublic school administrators as the primary intervention.</p> <p><b>RESOURCE ALLOCATON:</b> No additional cost</p>
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**REVISED 18-2.1** *Identify the schools that have (a) evidenced difficulty in complying with the required components of the comprehensive evaluation process, and schools that have (b) high numbers of African American students (if they also have comprehensive evaluation compliance needs) for additional training and support for implementing of pre-referral interventions, including procedures for documentation, prior to consideration of an eligibility of emotionally disturbed.*

**Identified School Criteria:**

Data Identified schools will be those that have evidenced difficulty in complying with the required components of the comprehensive evaluation based on comprehensive evaluation mapping needs data.

**Accountable Personnel:**

**Associate Superintendent, Division of Special Education**

- Identify schools and notify Local District Superintendents and Support Unit Administrators.

- Develop differentiated training on the implementation of procedures for (a) pre-referral intervention and documentation, , (b) behavior support,, (c) multidisciplinary assessment, and (d) parent participation to reduce inappropriate identification of African American students as emotionally disturbed.
- Continue to follow Bulletin 4182 that describes an alternative way that parents may participate at IEP meetings for students being considered for the eligibility of ED.
- Report to the Board of Education and Independent Monitor the progress of implementation of all major areas of the comprehensive evaluation process for students who may be considered for ED eligibility with data provided from monitoring activities conducted by psychological services.

**Local District Superintendents**

- Collaborate in planning and strategy implementation for targeted schools.
- Supervise Directors regarding oversight of targeted schools for implementation of all major areas of the comprehensive evaluation process to reduce inappropriate identification of African American students as emotionally disturbed.

**Targeted Principals**

- Supervise school administrators responsible for implementation of all major areas of the comprehensive evaluation process.

**Initiation Timeline:** November 2008

**Progress Monitoring:**

<b>Intervals</b>	<b>Indicators</b>
November 2008	List of identified schools identified according to compliance needs criteria
December 2008	Comprehensive Evaluation training developed for identified schools
January 2009	Continue to use written communications that parent participation at IEP meetings for students being considered for the eligibility of ED may include alternative forms of participation such as teleconferencing developed and distributed; training/assistance provided to targeted schools; first quarter monitoring report data completed; quarterly report to the Board of Education and the Independent Monitor
April 2009	Monitoring report data completed; quarterly report to the Board of Education and the Independent Monitor
June 2009	Monitoring report data completed; quarterly report to the Board of Education and the Independent Monitor

<b>18-3</b>	<p><b>STRATEGY:</b> Provide supports to data identified schools for expanding their capacity to serve African American students identified as emotionally disturbed in their home schools and in general education classrooms.</p> <p><b>RESOURCE ALLOCATON:</b> No additional cost</p>
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**REVISED 18-3.1:** *Continue to provide supports appropriate to targeted school needs for serving African American students identified as ED in their home schools and in general education classrooms.*

**Identified School Criteria:**

Data Identified schools will be those that have the highest numbers and percentages of African-American students identified, or being identified, with an eligibility of ED.

**Accountable Personnel:**

*Associate Superintendent, Division of Special Education*

- Identify identified schools and notify Local District Superintendents and Support Unit Administrators.
- Develop and provide training on the implementation of a multi-tiered service model for identified schools to serve students with the eligibility of ED in their home school and in the general education classroom for 40% or more of the instructional day.
- Report to the Board of Education and Independent Monitor the progress of implementation of multi-tiered service models for identified schools to serve students with the eligibility of ED in their home school and in the general education classroom for 40% or more of the instructional day.
- Provide Schoolwide Integration Checklist for schools with students having an eligibility of ED.

*Local District Superintendents*

- Collaborate in planning and strategy implementation for targeted schools.
- Supervise Directors regarding oversight of identified schools for implementation of multi-tiered service models for identified schools to serve students with the eligibility of ED in their home school and in the general education classroom for 40% or more of the instructional day.

*Targeted Principals*

- Supervise school administrators responsible for implementation of multi-tiered service models to serve students with the eligibility of ED in their home school and in the general education classroom for 40% or more of the instructional day.

**Initiation Timeline:** November 2007

**Progress Monitoring:**

<b>Intervals</b>	<b>Indicators</b>
November 2008	List of identified schools identified according to target criteria
December 2008	Differentiated training developed for identified schools; Schoolwide Integration

<b>Intervals</b>	<b>Indicators</b>
	Checklist provided to general education schools with students having ED eligibility.
January 2009	Training/assistance provided to identified schools; first quarter monitoring report data completed; quarterly report to the Board of Education and the Independent Monitor
April 2009	Monitoring report data completed; quarterly report to the Board of Education and the Independent Monitor
June 2009	Monitoring report data completed; quarterly report to the Board of Education and the Independent Monitor

<b>18-4</b>	<p><b>STRATEGY:</b> Continue to maintain a systematic case review (also known as “peer” review) committee process for all cases of students suspected of having a disability of emotional disturbance.</p> <p><b>RESOURCE ALLOCATON:</b> No additional cost</p>
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**ADDED 18-4.1:** *Continue as systematic case review committee process as initiated in 2006-2007 for all cases of students suspected of having a disability of emotional disturbance.*

**Accountable Personnel:**

*Associate Superintendent, Division of Special Education*

- Conduct ongoing case reviews for all students suspected of having a disability of emotional disturbance to monitor cases for compliance and determine patterns of noncompliance with all elements of comprehensive evaluation checklist.
- Provide individual school interventions for noncompliance patterns.

**Initiation Timeline:** July 2007

**Progress Monitoring:**

<b>Intervals</b>	<b>Indicators</b>
July 2008	Case review procedures convened in each support unit. School interventions initiated.
April 2009	Monitoring report data completed; quarterly report to the Board of Education and the Independent Monitor
June 2009	Monitoring report data completed; quarterly report to the Board of Education and the Independent Monitor

<b>18-5</b>	<b>ADDED Analyze data to identify issues and target interventions for school and support staff to uniformly apply the criteria for comprehensive evaluations when considering the eligibility of ED.</b>
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**Added 18-5.1:** Provide itemized data on the comprehensive evaluation for ED regularly to staff meetings of APEIS, designated secondary administrators, bridge coordinators, school psychologists, nursing coordinators, LRE specialists, program specialists, support unit staff, MCD review teams, and charter and nonpublic school administrators.

**Accountable Personnel:**

*Associate Superintendent, Division of Special Education*

- Collect monthly data on the specific data identified comprehensive evaluation component compliance needs
- Provide individual school and local district data that address compliance needs.

*Local District Superintendents*

- Collaborate in planning and strategy implementation for data identified schools.
- Supervise Directors regarding oversight of data identified schools for following up on specified comprehensive evaluation component compliance needs to reduce inappropriate identification of African American students as emotionally disturbed.

*Data Identified Principals*

- Supervise school administrators responsible following up on data identified comprehensive evaluation component needs.

**Initiation Timeline:** November 8

**Progress Monitoring:**

<b>Intervals</b>	<b>Indicators</b>
November 2008	Provide feedback to schools identified according to comprehensive evaluation compliance criteria .
December 2008	Provide feedback to schools identified according to comprehensive evaluation compliance criteria.
January 2009	Continue to provide feedback to schools identified according to comprehensive evaluation compliance criteria.
April 2009	Continue Provide feedback to schools identified according to comprehensive evaluation compliance criteria.
June 2009	Continue Provide feedback to schools identified according to comprehensive evaluation compliance criteria.

**ADDED Strategy 18-5.2: *Distribute and review Bulletin 4182, “Parent Participation at Individualized Education Program (IEP) Meetings for Students Suspected of Having Emotional Disturbance (ED)” with appropriate non-public school administrators.***

**Accountable Personnel:**

**Associate Superintendent, Division of Special Education**

- Collect monthly data on the specific data identified comprehensive evaluation component compliance needs
- Provide individual school data that address compliance needs and noncompliance patterns.
- Review compliance needs and Bulletin 4182 components in regularly scheduled non-public schools directors meetings

**Initiation Timeline:** January 2009

**Progress Monitoring:**

<b>Intervals</b>	<b>Indicators</b>
January 2009	Provide feedback to schools identified according to comprehensive evaluation compliance criteria.
April 2009	Continue to provide feedback to schools identified according to comprehensive evaluation compliance criteria.
June 2009	Continue to provide feedback to schools identified according to comprehensive evaluation compliance criteria.

<b>18-6</b>	<p><b>ADDED Collaborate with the Support Units in developing viable middle school and high school programs for students with an ED eligibility on general education sites.</b></p> <p><b>RESOURCE ALLOCATION: No Additional Cost</b></p>
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**ADDED Strategy 18-6.1: Collaborate with the Division of Special Education’s Director of Program/Fiscal Accountability, School Utilization and the Support Unit Administrators to identify available space on general education sites for secondary students with an ED eligibility.**

**Accountable Personnel:**

**Associate Superintendent, Division of Special Education**

- Identify available space at secondary campuses for the purpose of restructuring existing special day programs to accommodate students with an ED eligibility.
- Support Unit to identify secondary students with an ED eligibility who are transitioning from an elementary or middle school for the purpose of clustering students for integration at secondary campuses.
- Provide Schoolwide Integration Checklist for schools with students having an eligibility of ED.

**Local District Superintendent**

- Collaborate with the Support Unit Administrators in the identification of available space on secondary campuses.

**Target School Principal**

- Work with Support Unit personnel to identify barriers including school environment and the instructional program.

**Initiation Timeline:** October 2008

**Progress Monitoring:**

<b>Intervals</b>	<b>Indicators</b>
November 2008	Available space at secondary campuses for the purpose of providing integration opportunities for students with an ED eligibility identified by the Support Units.
December 2008	Schoolwide Integration Checklist provided to general education schools with students having ED eligibility.
May 2009	List of students transitioning to secondary campuses with an ED eligibility prepared.

## **Appendix A: Outcome 18**

**Division of Special Education**

**ADAPTED FROM THE OFFICE OF THE INDEPENDENT MONITOR'S DOCUMENT**

**OUTCOME #18: DISPROPORTIONALITY  
COMPREHENSIVE EVALUATION PROCESS MONITORING DEVICE**

**STUDENT'S NAME:** \_\_\_\_\_ **DATE OF BIRTH:** \_\_\_\_\_

**REVIEWER/CASE REVIEW TEAM:** \_\_\_\_\_

**DATE OF REVIEW:** \_\_\_\_\_

- PARENT REQUEST FOR ASSESSMENT  
 Currently Receiving Special Education Services

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This document is intended as a monitoring device used by the Office of the Independent Monitor to determine if newly identified and triennially re-evaluated ED students have been provided a comprehensive evaluation and appropriate considerations for placement in the least restrictive environment, upon identification. This document represents a basic standard for an ED comprehensive evaluation and shall not limit the District from developing its own tools to assess the comprehensiveness of any evaluation process. The Office of the Independent Monitor will use various data sources for monitoring this outcome.

In no way will the case review process supplant the authority or legal intent of the IEP meeting. New information that emerges during the IEP meeting that was not evident during the case review process will be considered during the IEP meeting in determining eligibility and services.

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**1. REVIEW OF PRE-REFERRAL AND REFERRAL INTERVENTION**

FOR STUDENTS INITIALLY REFERRED FOR SPECIAL EDUCATION

Yes No

- 1-A   Documentation of an initial pre-referral intervention meeting, such as an SST or 504 Plan, that addresses the behavioral and/or academic concerns and actions to address these concerns.
- Report Card       Cum Folder       SST Form       IEP p.3, 4 or 12  
 Student Intervention Record Form (BUL-2075)       Other:
- 1-B   Documentation of a follow-up pre-referral intervention meeting, such as an SST or 504 plan (at least 3 months after the initial meeting) documenting the results of the interventions and the effect on the behavior.
- Report Card       Cum Folder       SST Form       IEP p.3, 4 or 12  
 Student Intervention Record Form (BUL-2075)       Other:
- 1-C   Evidence of parent participation at the pre-referral intervention meeting, such as an SST and/or parent conference.
- Report Card       Cum Folder       SST Form       IEP p.3, 4 or 12  
 Student Intervention Record Form (BUL-2075)       Other:
- 1-D   Pre-referral teams documentation of the following considerations:  
 attendance history;  recent changes in student's home environment;  student's primary language (if applicable); and,  vision and hearing screening

- 1-E   Report card or cumulative file comments indicate behavioral and academic concerns for **more than** one semester (secondary) or one year, prior to the date referral.
- 1-F   Documentation of one of the following; non-DIS counseling, behavior modification plan, and/or participation in a school-wide discipline program.
- Report Card       Cum Folder       SST Form       IEP p.3, 4 or 12  
 Student Intervention Record Form (BUL-2075)       Other:
- 1-G   Assessment plan and/or other documentation indicating behavioral concerns and consideration for ED as a suspected disability (such as Request for Assessment by parent).
- Assessment plan       Student Intervention Record Form (BUL-2075)

**FOR STUDENTS CURRENTLY RECEIVING SPECIAL EDUCATION SERVICES**

Yes No

- 1-H   Behavior support plan (IEP Behavior Support Plan) **Need to look at previous IEP**
- 1-I   Academic modifications and accommodations attempted to address the behavioral concerns  
 p.3       p.4       p.12      **(of current or previous IEP)**
- 1-J   Consideration for counseling services and/or referrals to school-wide discipline programs  
 p.3       p.4       p.12      **(previous IEP)**
- 1-K   Assessment plan indicating behavioral concerns and consideration for ED as a suspected disability (or statement in IEP p.3 or 12 indicating a re-evaluation due to behavioral concerns).

**2. ASSESSMENT**

PRESENT LEVELS OF PERFORMANCE P.3

Yes No

- 2-A   Health assessment to rule out whether an inability to learn is a result of a health or sensory condition.
- 2-B   Formal academic assessment and consideration of assessments based on curriculum and classroom performance.
- 2-C   Cognitive or general ability assessment identifying the student's strengths and weaknesses.
- 2-D   Multi-disciplinary social-emotional evaluation considering home and community behavior using the following measures:  observation in various settings (formal and informal);  ratings scales and /or other psychometric instruments; and,  interviews with at least one teacher and/or parent.
- 2-E   Comprehensive behavioral evaluation such as a functional behavioral analysis, functional assessment analysis or other behavioral evaluation that identifies the function of the behavior, the frequency and duration of the behavior, and the identification of alternative behaviors that may serve to replace the undesired behavior.
- Behavior Support Plan       p.3       Other:



		SUN	H	AA	W	O	SUE	H	AA	W	O	CEN/W	H	AA	W	O	SUS	H	AA	W	O	NPS	H	AA	W	O	
<b>Initially Referred</b>																											
Pre-Referral Meeting	1A													1													
Follow-Up Meeting	1B		1											2						1	1						
Parent Participation	1C													1													
Other problems/factors	1D													2													
Hist of Beh. Concerns	1E													1													
Interventions Documented	1F																										
Assess. Plan indicating ED	1G							4		1			1	1				3		1							
<b>Already Receiving SPED</b>																											
Behavior Support Plan	1H			1									1	2													
Academ Modifica/Accomodat	1I													1								1	2				
Counseling/School Discp	1J							6	1					1				4				1	2				
Assess. Plan indicating ED	1J								1	1			1	3								1	2				
<b>Assessment</b>																											
Health Assessment	2A													7													1
Formal Academic Assessm	2B			1										8													1
General Ability Assessment	2C																										
Multi-Disciplinary Social -Emot	2D							1																			
Comp Behavioral Evaluation	2E							2																			1
<b>Determination of ED Eligibility</b>																											
Comp. ED Elig. Statement	3A																										1
Consider Exclusionary Factors	3B							1															2	2			
Justification of Co-Morbidity	3C													1									3	4	1		
<b>IEP Team Recommendations</b>																											
Consider Behavior Support Plan	4A																							1	2		
Consider Least Restrictive Env.	4B		1					1															1	2			
Consider DIS Cnslng or Mental	4C									1																	
Consider Counseling goals	4D									1		1															
Parent Participation	4E		1	1	1			11	4	1	1			3						2			2	7		2	
Support Ctr Identified as ED		163	77	24	52	10	109	70	20	13	6	106	24	63	16	3	64	34	24	4	2	166	65	56	43	3	
Support Ctr % Meeting CE Criteria		155	74	21	50	10	74	48	13	10	3	78	20	43	12	2	45	23	17	3	2	148	61	42	43	3	
Support Ctr % Meeting CE Criteria		95	96	87	96	100	68	68	70	77	50	74	83	68	75	63	70	68	71	75	100	89	94	75	100	100	

<b>Totals for District</b>					
<b>No. Identified as ED</b>	608	270	187	134	24
<b>No. Evals meeting CE Criteria</b>	500	226	136	118	19
<b>% Meeting CE Criteria</b>	82	83	74	87	78

**Definitions:** **SUN:** Support Unit North, LD 1 & 2; **SUE:** Support Unit East, LD 4 & 5  
**CEN/W:** Support Unit Central-West, LD 3 & 7; **SUS:** Support Unit South, LD 6 & 8  
**H** = Hispanic; **AA** = African Americans; **W** = White; **O** = Other Ethnicities