OAKLAND UNIFIED SCHOOL DISTRICT
Community Schools, Thriving Students

Board Cover Memorandum

To
Board of Education

From
Kyla Johnson-Trammell, Superintendent
Sondra Aguilera, Chief Academic Officer
Heather Palin, Executive Director of Multi-Tiered Systems of Support
Andrea Bustamante, Executive Director of Community Schools, Student Services
Jennifer Blake, Executive Director of Special Education
Raquel Jimenez, Executive Director of the Office of Equity

Meeting Date
December 13, 2023

Subject
2023 Comprehensive Coordinated Early Intervening Services (CCEIS) Plan and Budget

Ask of the Board
Approval by the Board of Education of the 2023 Comprehensive Coordinated Early Intervening Services Plan & Budget.

Background
Each year, the California Department of Education (CDE) conducts an analysis of the rates associated with identification of Special Education services. As a result, school districts are notified when their rates of special education are disproportionate and in which specific areas of special education they are disproportionate. Oakland Unified has been identified as being disproportionate for the over-identification of African American students that qualify for Special Education services under Emotionally Disturbed and for suspending African American students who have Individualized Education Programs (IEPs) at higher rates than their peers who also receive IEP services. As a District identified as significantly disproportionate, we must devise a Comprehensive Coordinated Early Intervening Services Plan (CCEIS) for implementation.

Under the Federal Individuals with Disabilities Education Act (IDEA) Determining significant disproportionality requirements, if a LEA is identified as significantly disproportionate, the LEA must reserve 15 percent of its 611 and 619 IDEA grant funds to address factors contributing

to the significant disproportionality (See 34 CFR sections 300.646(c) and (d).)

An LEA must develop a CCEIS plan to identify and address the factors contributing to the significant disproportionality in the LEA for the identified category (See 34 *CFR* section 300.646(d)(1).) CCEIS activities must:

- Include children not currently identified as needing special education or related services but who need additional academic and behavioral support to succeed in a general education environment;

- Address the needs of those student subgroups that were identified as the basis for the LEA's identification as significantly disproportionate, but not exclusively, for those student subgroups;

- Focus on instructional activities for children age three through twelfth grade with primary focus on age three through third grade;

- Allow expenditures on children ages three through five if an LEA has an established preschool program as part of the educational system;

- Focus on academic and behavioral instructional services and professional development; and

- Occur within the allowable CCEIS budget period (27 months).

(See 34 *CFR* sections 300.646(d)(3) and (4).)

Discussion	The CCEIS process includes Four Steps to create and implement the CCEIS Plan. Each Phase consists of milestones that lead to the description of the plan details.

Step 1 includes:

- Formation of a Leadership Team and a Stakeholders Team. These teams are tasked with completing relevant milestones to design the plan. These teams will also be responsible for future implementation planning and reporting on the progress of our plan.
- Collection of relevant data that provides multiple views on outcomes for our African American students.

Step 2 includes:

- Examine current initiatives and programs to address racial and ethnic disproportionality;
- Complete a self reflection on relevant data;
- Conduct focus groups so that the qualitative data examined is triangulated with the experiences multiple stakeholders have in our District.
- Use quantitative and qualitative data to form the Root Causes for OUSD.

Step 3: Plan for Improvement
The Plan for Improvement describes the Strategy and Measurable Outcomes our teams identified to address the above named Root Causes. There are associated activities and an approximate associated budget described in the body of the plan for improvement.

Step 4: Progress Monitoring

The final part of the plan describes how the improvement plan will be implemented, how we will evaluate effectiveness, and how we are thinking about sustainability of these CCEIS Plan activities after 24 months of implementation. We will document implementation, make necessary adjustments, and create progress reports that are submitted to the CDE on a quarterly basis.

Fiscal Impact   The LEA must reserve 15 percent of its 611 and 619 IDEA grant funds to address factors contributing to the significant disproportionality (See 34 CFR sections 300.646(c) and (d).) For Oakland Unified School District, the amount of funds that have been set-aside is $1,353,434.00.

Attachment
- Presentation - 2023 Comprehensive Coordinated Early Intervening Services Plan
- 2023 Comprehensive Coordinated Early Intervening Services Plan
- 2023 Comprehensive Coordinated Early Intervening Services Plan Budget

Overview

During *Step 2: Investigate*, the CIM Team developed and prioritized root causes. In *Step 3: Planning*, the CIM Team will use these root cause(s) to develop the CIM Plan. Completion of CIM plan development will include the following:

Section 1: CIM Team Members, Overall Goal/Problem of Practice, and Prioritized Root Causes

Section 2: High Leverage Strategies and Supporting Activities; Expected Measurable Outcomes; Standards of Success; and Methods of Measurement

The CIM Team will enter required information into the forms at the end of this document and submit this completed document for review (to either the Special Education Local Plan Area (SELPA) or the California Department of Education (CDE), as applicable to the LEA's monitoring tier and level).

Section 1: CIM Team Members, Overall Goal/Problem of Practice, and Prioritized Root Causes

The LEA will identify members of the CIM Team, list the overall goal/problem of practice of the CIM plan and the prioritized root cause(s). CIM Plan implementation will be completed by June, 2026. For Significantly Disproportionate (SIGDIS) Local Educational Agencies (LEAs), the CIM must be completed by September, 2025.

Section 2: High Leverage Strategies and Supporting Activities; Expected Measurable Outcomes; Standards of Success; and Methods of Measurement

For each high leverage strategy, identify the expected measurable outcome(s), and applicable root cause(s). For SIGDIS LEAs, the target population must be included. List the activities that will be implemented in support of the high leverage strategy with the staff responsible for implementation and monitoring; the timeline; the appropriate data sources and methods for evaluating progress; and the appropriate required resources. For SIGDIS LEAs, the funding source must be included.

Section 1: CIM Team Members, Overall Goal/Problem of Practice, and Prioritized Root Causes

CIM Team Members:
List your CIM Team members. Indicate Yes (Y) or No (N) regarding whether the listed member will be responsible for overseeing implementation of the CIM Plan. List the primary contact person first.

Name (list the primary contact person first)	Role	Email	Responsible for overseeing implementation? (Y or N)
Sondra Aguilera	Chief Academic Officer	sondra.aguilera@ousd.org	Y
Heather Palin	Multi Tiered Systems of Support Director	heather.palin@ousd.org	Y
Jennifer Blake	Executive Director, Special Education	jennifer.blake@ousd.org	Y
Andrea Bustamante	Executive Director, Community Schools Student Services	andrea.bustamante@ousd.org	Y
Raquel Jimenez	Executive Director, Office of Equity	raquel.jimenez@ousd.org	Y

Overall Goal or Problem of Practice:
List the identified guiding factor for the CIM plan (Overall Goal or Problem of Practice):

Overall Goal or Problem of Practice
The goal of the 2023 Comprehensive Coordinated Early Intervening Services (CCEIS) Plan is to improve the pre-referral services to students and families prior to a referral for special education testing.

Prioritized Root Causes:
List no more than three root causes, prioritized in order of importance, along with data summary statements that support the root cause:

Root Cause	Data Summary Statements
1. Lack of consistent pre-referral interventions for students demonstrating behavioral and academic challenges.	**Sources used to arrive at this root cause include:** ● Initial referral data indicate high rates of special education assessment referrals across schools, often without documented pre-referral interventions ○ Persistently high referrals at a subset of elementary schools, including International Community School, Melrose Leadership Academy, Laurel, Peralta, Reach, and Lockwood STEAM ● Lack of a consistent mechanism for holding SSTs and collecting SST decisions ● Inconsistency in the structure and functioning of Coordination of Services Teams (COST), both in terms of composition of the team and execution of intervention decisions following student referrals.

2. Lack of culturally-responsive, anti racist/anti-ableist pedagogy present across classrooms prior to being referred for special education assessments.	● Focus group data
	  ○ Families who received initial evaluation and services earlier in their student's life reported greater satisfaction with their student's progress and overall support.
	  ○ Most families reported feeling like they understood the Special Education evaluation process and were included in the IEP conversation, though several families reported feeling like the initial evaluation process took longer than necessary.
	  ○ Many families reported an experience with one or more OUSD staff members where their

concerns about their child felt dismissed, minimized, or distilled into the *child* needing to change instead of the support the child was receiving needing to change.

- Families report feeling like staff and leadership do not adequately understand the lived experience of being a Black child in Oakland and expressed concerns about discipline and treatment perpetuating longstanding access and health gaps that harm Black people (e.g. school-to-prison pipeline).

- Suspensions
  - In 2022-23, the overall suspension rate was .9%, but it was 5.3% for African American students broadly and 4.4% for African American students with IEPs
  - If you are an African American student with an IEP, you are nine times more likely to be suspended from school for at least one day in a school year, when compared to a student who is not African American and does not have an IEP.
  - By middle school, just under 14% of AA students with an IEP have been suspended from school at least once.
  - Last year, students with IEPs under OHI accounted for almost 33% of all suspensions of students with IEPs, and students under ED represented almost 18% of suspensions of students with IEPs, both of which are disproportionate compared with their

	percentage of our overall Special Education population.
	• No training for staff about ADHD beyond school psychologists
	• School site learning walks focused on observation of indicators of strong culturally-responsive and anti-racist/ableist tier I practices demonstrate persistent gaps in implementation of strategies at the classroom level.

Section 2: High Leverage Strategies and Supporting Activities; Expected Measurable Outcomes; Standards of Success; and Methods of Measurement

For each high leverage strategy selected by the CIM Team, describe the Expected Measurable Outcome(s) as a result of implementing each high leverage strategy. Include a description of the quantifiable standard of success and applicable root cause(s). SIGDIS LEAs must also list the identified target population.

For each activity, describe the standard of success and how it will be measured. Identify the staff responsible for implementation and monitoring of the activity, as well as the associated timeline and the required resources. SIGDIS LEAs must also list the related funding source.

Collectively, high leverage strategies should address prioritized root causes. Please be specific.

High Leverage Strategy #1

High Leverage Strategy: Develop and implement Multi-Tiered Systems of Support at the schools serving the identified target population.

Expected Measurable Outcome(s): By September 30, 2026, 100 % of schools with students in our focus population will implement Multi-Tiered Systems of Support as evidenced by Coordination of Services Teams (COST), documented Student Success Team (SST) meetings, improved positive behavior support systems and documented accommodation plans through the Section 504 process.

Applicable Root Cause(s): (1) Lack of consistent pre-referral interventions for students demonstrating behavioral and academic challenges.

Target Population: Schools that identify high numbers of students for special education referrals for literacy and behavior support given the size of their total school enrollment. Schools with high suspension rates and the lack of documented tier 2 and tier 3 interventions after reviewing School Site Plans for Achievement (SPSAs) or lack of pre-referral interventions in Tiers 2 and 3 as documented through COST and SSTs. Additionally, K-5 students at these schools identified to be 2 or more grade levels behind in reading as demonstrated by iReady.

Note: For SIGDIS only

Activity*	Staff Responsible for Implementation and Monitoring	Timeline	Data Sources/Methods for Evaluating Progress (as appropriate)	Resources Required (as appropriate)	Funding Source (SIGDIS Only)
Activity 1.1 Site based COSTs are evaluated against an effectiveness rubric as a baseline to identify the strengths and growth areas for each of the	Multi-Tiered Systems of Support Director and Partners	March 2024- September 2026	COST Team Rubric	MTSS Staff	Title 4 LCFF

school site teams within the target population.					
Activity 1.2 Site based SSTs are evaluated and documented on a consistent basis.	Multi-Tiered Systems of Support Director and Partners	March 2024-September 2026	SST Rubric	SST Platform	CCEIS
Activity 1.3 Professional learning and in-classroom support is provided by Behavior Specialists to build the capacity of teachers and school based staff.	Community Schools Student Services Executive Director	June-August 2024	Professional Learning Participation Site Support Log Classroom Observations	Behavior Specialists Professional Learning Stipends	CCEIS
Activity 1.4 Professional learning is provided to classroom teachers on attention based disabilities and accommodation plans as provided within the Section 504 process.	Health Services Director Special Education Executive Director	June-September2024	Professional Learning Participation Section 504 database	Professional Learning Stipends Health Service Director Special Education Executive Director	CCEIS LCFF

*Add more rows for Activities, as needed. **If the activity is expected to be "on-going," the End Date would be the point in which the activity is fully implemented and could be initially assessed.*

High Leverage Strategy #2

High Leverage Strategy: Increase trusting relationships between families and school site staff.

Expected Measurable Outcome(s): By September 30, 2026 schools serving the identified target population will, participate in foundational equity learning at a rate of 80 % of staff, offer educational support activities for families where 60% of families will participate, and access District recruitment pipelines to increase the number of African American staff working at the school.

Applicable Root Cause(s): (2) Lack of culturally-responsive, antiracist/anti-ableist pedagogy present across classrooms prior to being referred for special education assessments.

Target Population: Schools that identify high numbers of students for special education referrals for literacy and behavior support given the size of their total school enrollment. Schools with high suspension rates and the lack of documented tier 2 and tier 3 interventions after reviewing School Site Plans for Achievement (SPSAs) or lack of pre-referral interventions in Tiers 2 and 3 as documented through COST and SSTs. Additionally, K-5 students at these schools identified to be 2 or more grade levels behind in reading as demonstrated by iReady.

Note: For SIGDIS only

Activity*	Staff Responsible for Implementation and Monitoring	Timeline	Data Sources/Methods for Evaluating Progress (as appropriate)	Resources Required (as appropriate)	Funding Source (SIGDIS Only)
Activity 1.1 Design and implement foundational equity learning.	Office of Equity Executive Director	March 2024- September 2026	Participation in foundational equity learning.	Professional Learning Stipends Professional Learning Provider Contracts	CCEIS LCFF
Activity 1.2 Design and implement 3 educational support activities for families.	Office of Equity Executive Director Community Schools Student Services	March 2024- September 2026	Participation in educational support activities by families.	Professional Learning Stipends	CCEIS LCFF

	Executive Director				
Activity 1.3 District recruitment pipelines will prioritize the recruitment and hiring of African American staff.	District Talent Recruiters	March 2024- September 2026	Increase to the number of African American staff.	District Talent Recruiters	CCEIS LCFF Title 2

*Add more rows for Activities, as needed. **If the activity is expected to be "on-going," the End Date would be the point in which the activity is fully implemented and could be initially assessed.*

2023 CIM for CCEIS BUDGET FORMS

Significant Disproportionality Compliance and Improvement Monitoring (CIM) for Comprehensive Coordinated Early Intervening Services (CCEIS)

Budget Form 1: 2023 BUDGET ALLOCATION

Provide the Fiscal Year 2022–23 allocation awarded for Resource Codes 3310 and 3315:

2022 Resource **3310** Allocation	2022 Resource **3315** Allocation
$ 8,783,287	$ 239,604

Provide the Fiscal Year 2023–24 allocation awarded for Resource Codes 3310 and 3315:

Provide the 2023 allocations the SELPA provided to the identified LEA for resource codes 3310 and 3315. The 15 percent set-aside for CCEIS expenditures will be determined from these two resource codes.

2023 Resource **3310** Allocation	2023 Resource **3315** Allocation
$ 8,783,287	$ 239,604

In the box below, indicate the 15 percent set aside for each of the Fiscal Year 2023–24 allocations the LEA was awarded for resource codes 3310 and 3315:

2023 CCEIS Resource 3312 **3312 = 15% of 3310**		2023 CCEIS Resource 3318 **3318 = 15% of 3315**		Total 2023 CCEIS Budget **(3312 plus 3318)**
$ 1,317,493	**plus**	$ 35,941	**equals**	$ 1,353,434

The above 15 percent set-aside amounts will be the 2023-24 CCEIS allocations for resource codes 3310 (CEIS Resource Code 3312) and 3315 (CEIS Resource 3318) and should be expended and reported accurately in quarterly CCEIS Progress and Expenditure Reports.

Please use the Total 2023 CCEIS Budget indicated above to complete the 2023 Allowable Costs Budget form on the next page.

Budget Form 2: 2023 BUDGET ALLOWABLE COSTS

Complete the table below to reflect the **Total 2023 CCEIS Budget** as reported on the 2023 Budget Allocation. CCEIS expenses for 2023 must conform to the U.S. Office of Special Education Programs (OSEP) IDEA Part B Regulations Significant Disproportionality (Equity in IDEA). For detailed allowable CCEIS expenditures, please refer specifically to Questions C-3-1 through C-3-10, pages 19 through 24, on the U.S. Department of Education Web page at https://sites.ed.gov/idea/files/significant-disproportionality-qa-03-08-17-2.pdf.

The 2023 CCEIS period is July 1, 2023, through September 30, 2025. The CCEIS 15 percent set-aside must be fully expended by September 30, 2025.

2023 Budget Line Items	Brief Description of 2023 CCEIS Activities	Amount for each CCEIS Activity
1000–Certified Salaries	Professional Learning Stipends	$ 275,217
2000–Classified Salaries	Behavior Specialists District Talent Recruiter	$ 288,000
3000–Employee Benefits	Behavior Specialists District Talent Recruiter Professional Learning Stipend Benefits	$ 333,945
4000–Materials and Supplies	Professional Learning Costs	$ 45,000
5000–Services and Other Operating Costs		$
5100–Contract Services (ICR cannot be used for Object Code 5100)		$
5800–Contract Services*	MTSS Technical Assistance SST Platform	$ 375,000
7300–Indirect Cost Rate (ICR) CDE-approved rate of (2.68 percent)		$ 36,272
Total Amount for 2023 CCEIS Activities. The amount must equal the Total 2023 CCEIS Budget as indicated on the 2023 Budget Allocation Summary.		$ 1,353,434

Services for the same vendor are capped at $25,000 in 5800 Budget Line. The remainder must be moved into the 5100 Budget Line.

Signature of fiscal/business agents validate the accuracy of the information reported:

LEA Business Fiscal Officer (Print Name & Signature)	Date Signed: Contact Phone:
SELPA Business Fiscal Officer (Print Name & Signature)	Date Signed: Contact Phone:

Note: *This budget will be revised after actual allocations are finalized. The form for documenting revisions to the budget is a standalone document available on the 2023 CIM for CCEIS Padlet.*

The budget forms should be emailed to the California Department of Education by November 30, 2023: <u>intensivemonitoring@cde.ca.gov</u>.

Name: Kyla Johnson-Trammell
Position: Superintendent and Secretary, Board of Education

Name: Mike Hutchinson
Position: President, Board of Education

Sign: *[signature]*   Date: 12/15/2023

Sign: *[signature]*   Date: 12/15/2023