



INDIANA  
DEPARTMENT *of*  
EDUCATION

# Results Driven Accountability (RDA) Root Cause Analysis

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## Indicator 10: Disproportionate Representation in Specific Disability Categories

Indiana Department of Education  
Office of Special Education

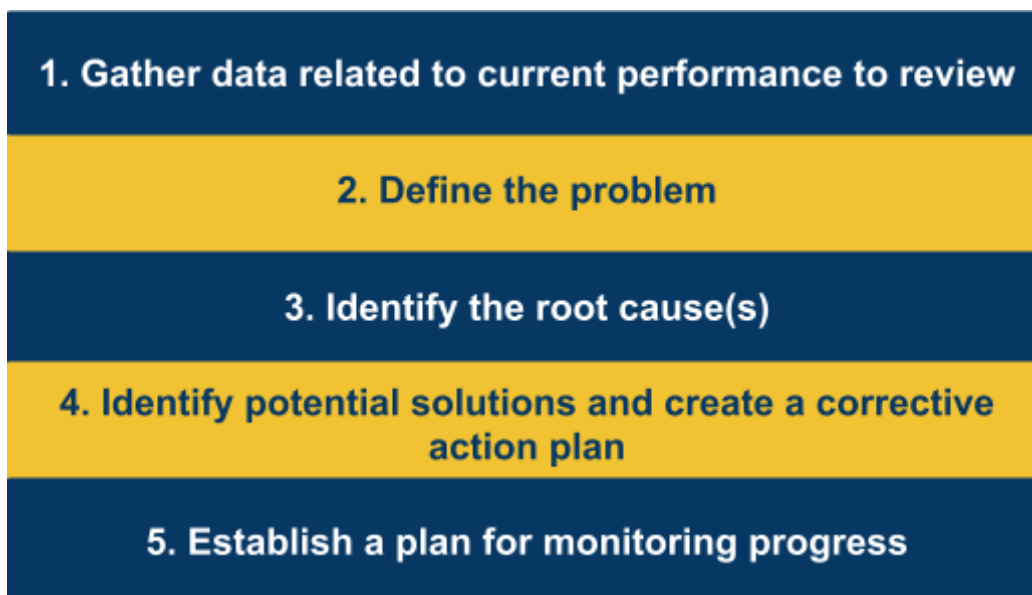


**Indicator 10: Disproportionate Representation in Specific Disability Categories****Definition**

Percentage of districts with disproportionate representation of racial/ethnic groups in specific disability categories due to inappropriate identification.

- Identify whether the rate of special education identification for specific disability categories of a racial or ethnic group of students compared to all other racial or ethnic groups is disproportionate

This root cause analysis form aims to help districts analyze their policies, practices, and procedures related to evaluation and identification of students in particular racial/ethnic groups for particular disability categories. Root cause analysis seeks to understand why problems are happening and create a plan that will address those root causes and remove barriers to student learning. Root cause analysis and subsequent planning and implementation of corrective action is intended to be performed using a team approach. The steps for in depth root cause analysis, and subsequent corrective action and monitoring, are included below:



## Step 1: Gather Data Related to Current Performance to Review

Data sources to consider:

- School culture and climate data
- Curriculum and assessments reflecting Indiana's employability skills standards
- Disaggregated student academic data
- Classroom-level data (student and assignment grades)
- Transition plans for Individualized Education Programs (IEPs)
- Student course enrollment data, transcripts, and course of study
- Attendance records, service log, and/or pull-out schedules
- Discipline data
- Functional Behavior Assessments and Behavior Intervention Plans
- Response to Intervention (RTI/MTSS) data .

Policy and Procedure Review:

- Process to identify trends in referral for special education for specific student populations
- Process of Multi-Tiered Systems of Support (MTSS) and RTI to special education assessment
  - Process for providing parents with notice of procedural safeguards
- Procedures to ensure that assessments are:
  - Administered in the form most likely to yield accurate information on what the student knows and can do academically, developmentally, and functionally
  - Selected and administered so as not to be discriminatory on a racial or cultural basis
  - Used for the purposes for which the assessments or measures are valid and reliable
  - Administered by trained and knowledgeable personnel in accordance with any instructions provided by the producer of the assessments
  - Technically sound instruments that may assess the relative contributions of cognitive and behavioral factors, in addition to physical or developmental factors
- Procedures to ensure the student is assessed (or information is collected) in all areas related to the suspected disability, including, if appropriate, the following:
  - Development
  - Cognition
  - Academic achievement
  - Functional performance or adaptive behavior
  - Communication skills
  - Motor and sensory abilities, including vision or hearing
  - Available educationally relevant medical or mental health information
  - Social and developmental history
- Procedures to ensure assessment tools and strategies provide relevant information that directly assists the CCC in determining the special education and related service needs of the student

- Procedures to ensure educational evaluations are sufficiently comprehensive to identify all of the student's special education and related service needs, whether or not commonly linked to the disability category in which the student has been classified
- Process for determining that a student's eligibility for special education and related services is not related to a lack of appropriate instruction in reading, a lack of appropriate instruction in math, or limited English proficiency

#### Key Questions:

- Does the district have evidence that they maintain a supportive environment for students with diverse racial, cultural, ethnic, and linguistically diverse backgrounds?
- Does the district have an established multi-tiered model of intervention services for behavior and academics?
- Has the district, and each individual school, established an atmosphere that views all students as "our students" as opposed to "my students" and "your students" when it comes to students receiving special education services?
- Are staff provided appropriate support to collaborate to support all students?
- Has the district, and each individual school, established a system for tracking students receiving tiered intervention for fidelity and progress monitoring?
- Has the district, and each individual school, established a system for referring students for special education based on progress monitoring data collected in tiered intervention services?
- How is it ensured that school teams consider contributing factors (e.g., insufficient instruction in reading/math, limited English proficiency, excessive absences, environmental/socioeconomic factors) that may explain low achievement or behavior concerns, rather than automatically assuming a disability?
- Does the district have a system for ensuring all required components of a considered eligibility criteria are completed during the evaluation process?
- Review IDEA Data Center (IDC) Success Gaps [Toolkit](#) and [Rubric: Addressing Equity, Inclusion, and Opportunity](#)
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- Does the district have a system for ensuring all required components of a considered eligibility criteria are completed during the evaluation process?
- Review IDEA Data Center (IDC) Success Gaps [Toolkit](#) and [Rubric: Addressing Equity, Inclusion, and Opportunity](#)
- During the referral process, what considerations are made regarding the cultural or ethnic background of the student? How are these considerations captured during the MTSS/RTI process?
- In looking at the referral process(es):
  - What was the length of time between referral, the initial child find and/or RTI/MTSS team meeting, and assessment for special education eligibility?
  - What interventions supporting academic growth and student well-being were used prior to assessment and for how long? Did these interventions constitute the necessity of a 20-day referral timeline?
  - Are the interventions being used evidence-based and with fidelity?
- What is the process of ensuring that a student is assessed in all areas of suspected disabilities? How does the multidisciplinary team determine that a variety of assessments, tools, and strategies are being used to gather relevant functional, developmental, and academic information about the student (including information provided by the parent)?
- What structures are in place to ensure all factors relating to a student's cultural or ethnic background are taken into consideration when assessing a student for special education? How are these considerations documented?
- What processes are in place to review the eligibility of students eligible for special education? How does the multidisciplinary team determine the eligibility category for a student during the assessment process? How is secondary eligibility considered during the assessment process?
- What supports and resources are available to meet the needs of students who are struggling to make progress in any area?

## **Step 2: Define the Problem**

After reviewing the data, create a 1-2 sentence statement that includes information about the problem. The problem statement should include information about actual impact and potential impact of the problem and should cite specific data. Be as clear and specific as possible.

Example: White students are twice as likely to be identified with a specific learning disability (SLD) as students of other races based on an analysis of disaggregated student data.

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## **Step 3: Identify the Root Cause(s)**

A root cause is the primary or initiating factor that leads to an outcome, in this case, disproportionate identification of a specific racial/ethnic category for a specific eligibility category.

By understanding the root cause(s) of this issue, it will allow districts to focus on addressing the root causes that lead to the problem, not just the symptoms of the problem. Identifying the root cause requires that we dig deep into the issue and focus on why and how a problem is occurring.

Listed below are two tools (fishbone diagram, 5 Whys) that can be used to conduct a root cause analysis. Please select one to complete in your root cause analysis and attach it with your submission of your corrective action plan.

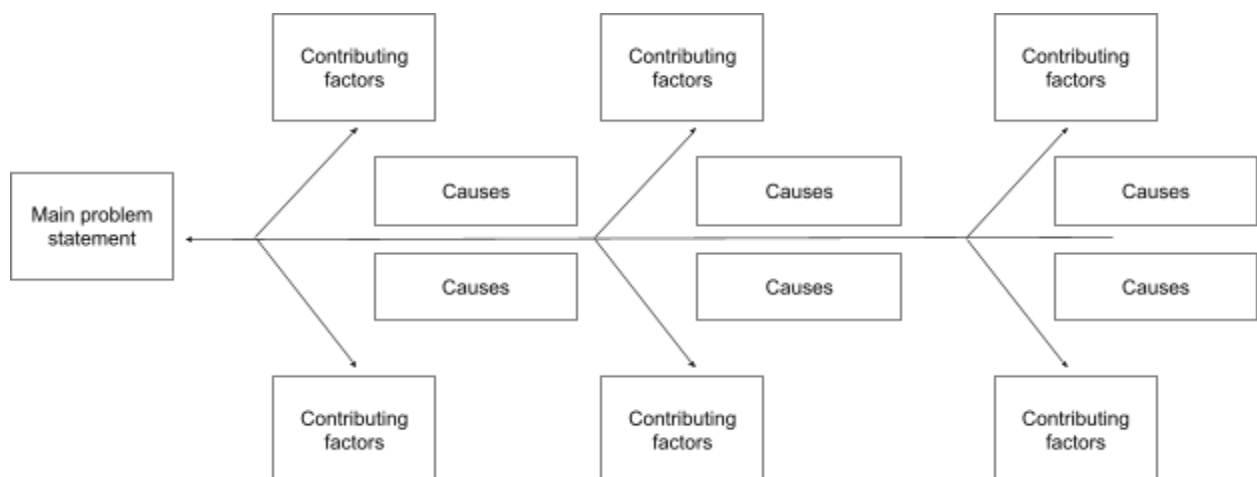
### Verify the Root Cause - Essential Questions

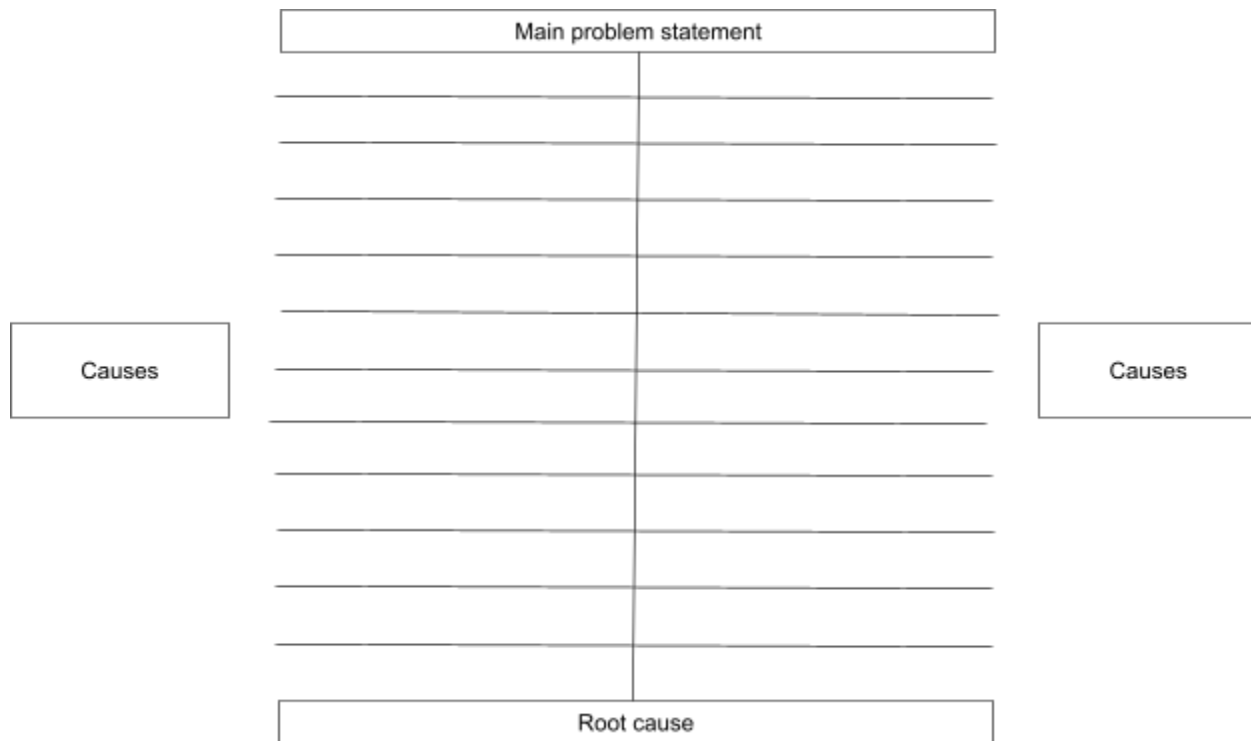
1. Did multiple data sources support the identification of this root cause?
2. Does the data support that this cause contributed to the problem?
3. Can anything else, besides this cause, lead to the problem?
4. Is this root cause within the school's control?
5. Are there actionable steps we can take to address the root cause?
6. Will correction of the cause lead to the problem no longer occurring?
7. Will elimination of this cause change the outcome?

### Fishbone Diagrams

A fishbone diagram is a chart that can help better understand the contributing factors and causes of a problem. Starting with the problem allows us to break down the factors that contribute to the problem and consider the causes of each factor.

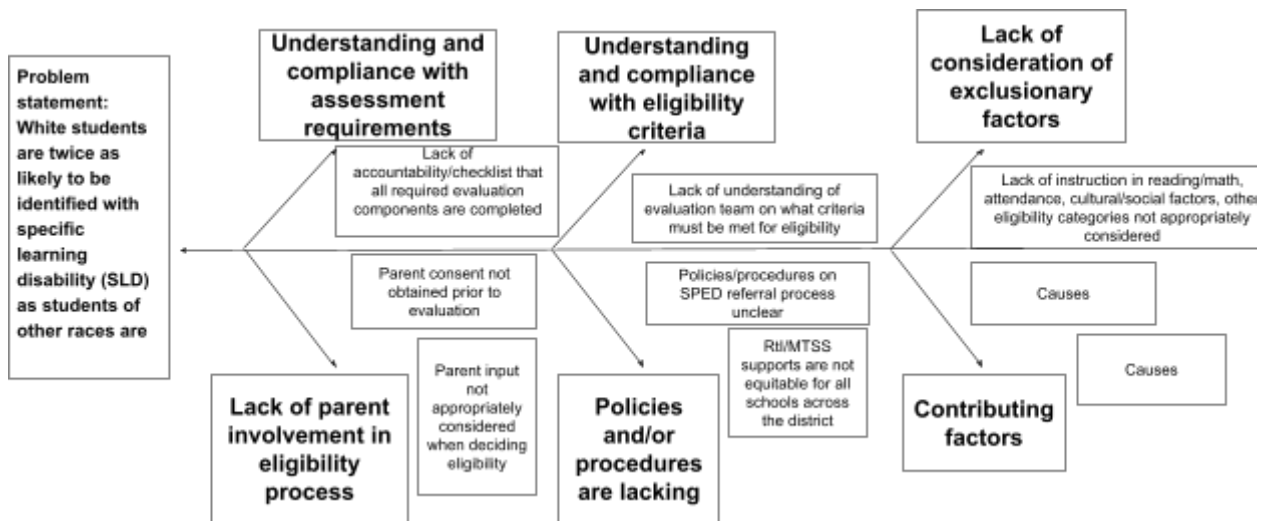
Work as a team to brainstorm causes by asking “why does this happen?” and write ideas with their related category. Continue to ask “why” and understand deeper levels of causes. Look for patterns or similarities that can be grouped together.



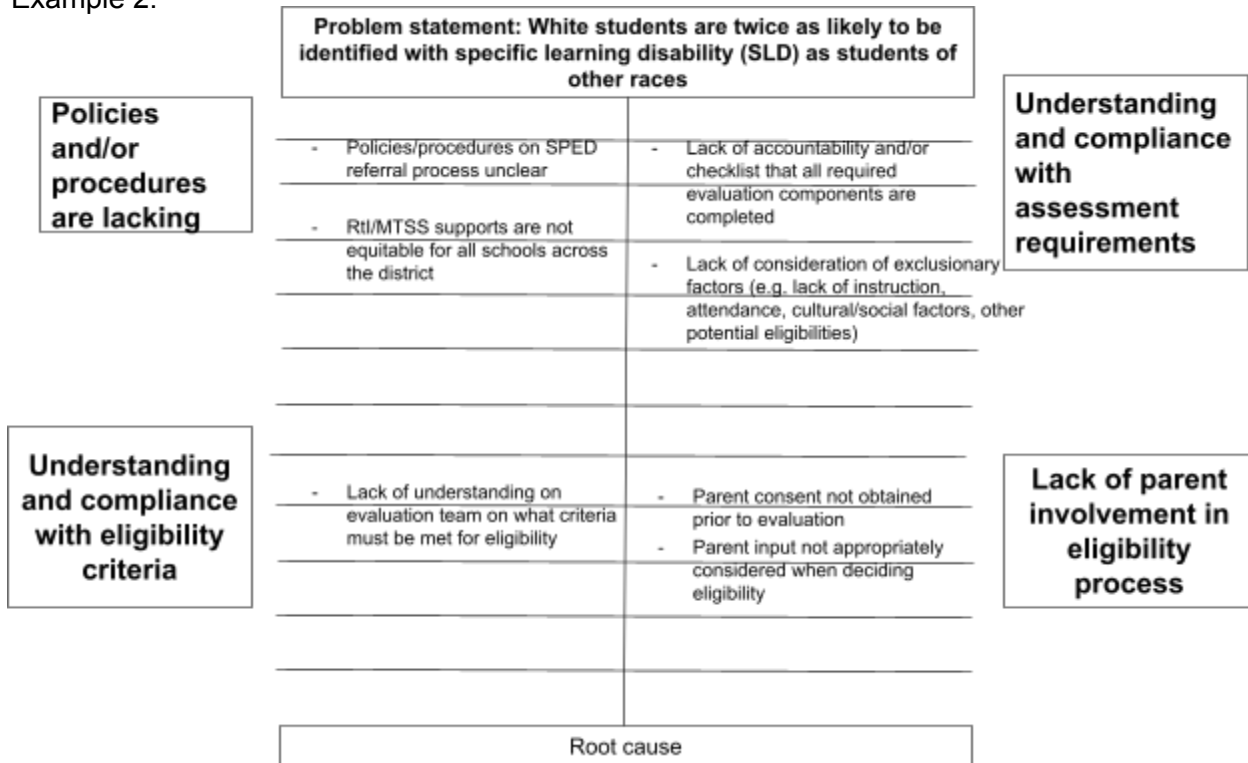


**Fishbone Diagram Examples**

Example 1:



Example 2:



**Understanding and compliance with assessment requirements**

**Lack of parent involvement in eligibility process**



## The Five Whys

The goal of root cause analysis is to discover the why. Asking “why” allows us to look beyond the symptoms of the problem and can lead us to the root cause. Continue asking “why” until the team agrees on the root cause. This may take more than five times of asking “why.” Make sure to focus on causes and factors that are within the district’s control and focus on adult actions.

Define the problem:

Why is the problem happening?

Why?

Why?

Why?

\*If an answer is something outside of your control as a district, go back to the previous response

Why?

Root cause

### The Five Whys Example

Define the problem: Black students are twice as likely to qualify for emotional disability (ED) as white students

Why is the problem happening?

Black students are more frequently referred to the office for behavior problems than other students

Why?

Teachers do not feel adequately supported and/or lack the resources to handle behaviors in the classroom

Why?

There are no district/school wide behavior supports in place for ALL students

Why?

Patterns of behavior and office referrals are not monitored/tracked

Why?

\*If an answer is something outside of your control as a district, go back to the previous response

The district has not established a system for supporting positive behavior for all students, therefore, referral/evaluation process for behavior concerns is not consistent across schools

Root cause

**Step 4 and 5: Create a Corrective Action Plan and Establish a Plan for Monitoring Progress**

The purpose for completing a corrective action plan is to identify actions that the district will take to correct individual findings of noncompliance and ensure there are systems in place for ensuring future compliance. Per Indiana Department of Education guidance, the district must submit verification of correction of noncompliance and evidence of corrective action for future compliance no later than one (1) year from the date of notification of noncompliance.

*Directions:* A blank copy of the corrective action plan for indicator 10 is located [here](#). Please copy the document and use it for your corrective action plan submission.