



INDIANA
DEPARTMENT *of*
EDUCATION

Results Driven Accountability (RDA) Root Cause Analysis

Indicator 9: Disproportionate Representation of Students with Disabilities by Race or Ethnicity

Indiana Department of Education
Office of Special Education



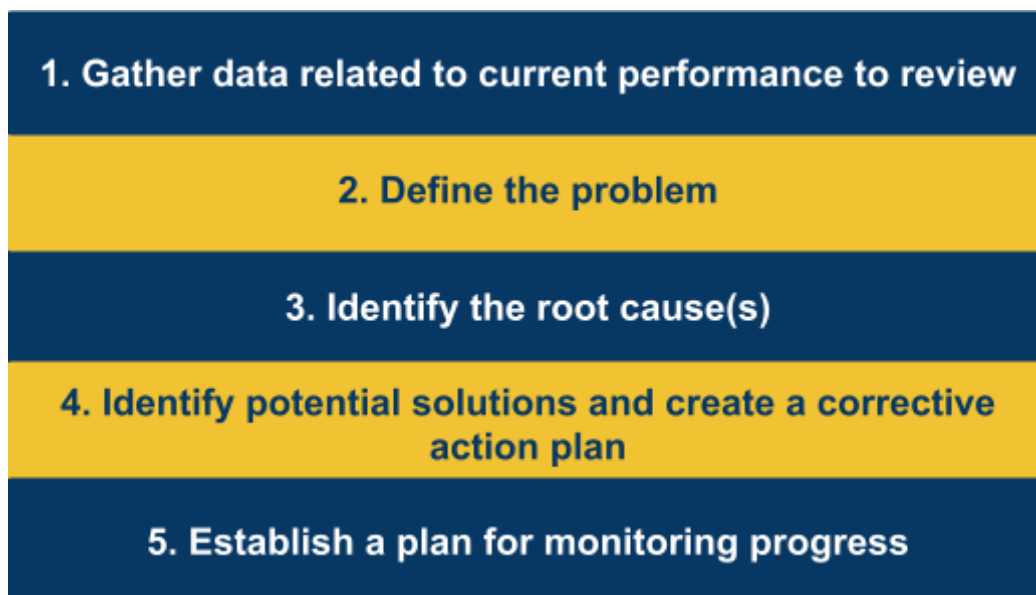
Indicator 9: Disproportionate Representation of Students with Disabilities by Race or Ethnicity

Definition

Percentage of districts with disproportionate representation of racial/ethnic groups due to inappropriate identification for special education.

- Identify whether the rate of overall special education identification 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 special education. 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:

- Data for referral to special education
- Disaggregated student academic data
- Annual performance report (APR) data
- Parent input data
- Local education agency's (LEA's) implementation of Response to Intervention (RtI), Universal Design for Learning (UDL), and Multi-Tiered Systems of Support (MTSS)
- Special Education Reporting (IDOE-SE) and Pupil Enrollment Reporting (IDOE-PE)
- Racial and ethnic group enrollment data
- Review IDEA Data Center (IDC) Success Gaps [Toolkit](#) and [Rubric: Addressing Equity, Inclusion, and Opportunity](#)

Policy and procedure review:

- Process to identify trends in referral for special education for specific student populations
- Process of MTSS to special education
 - Process for providing parents with notice of procedural safeguards
 - Process for determining the child's home language and their proficiency in English, and administering the assessment in the child's native language or other mode of communication
- Process of incorporating the following in classroom curriculum and teaching:
 - Practices regarding the cultural and ethnic background of students
 - Trauma-informed practices
 - English language acquisition supports

Key questions:

- When reviewing LEA's referral process(es):
 - What methods are utilized to track and analyze referrals?
 - What was the length of time between referral/initial child find or RTI/MTSS team or case conference committee (CCC) convening and participation in the assessment for special education eligibility?
 - What academic interventions are used prior to assessment? How long are interventions utilized prior to assessment? Did these interventions constitute the necessity of a 20-day referral timeline?
 - Is the intervention process clearly defined, and is student progress tracked effectively during interventions?
 - What data is utilized to measure the student's response to utilized interventions?
 - What interventions are being used to support students' well-being prior to assessment? How long are interventions utilized prior to assessment?
 - Are the interventions being used evidence-based?
- What structures are in place to ensure that educators are considering practices regarding the cultural and ethnic background of students when determining eligibility for special education?

- What supports and resources are available to meet the needs of students who are struggling to make progress in any area?
- How are students of all identities reflected in the curriculum, and throughout the community (e.g. events, images, art, etc.)?
- 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?

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: Black students are referred/found eligible for special education services twice as often as white students based on a review of the past two years of special education referral data.

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 special education. 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.

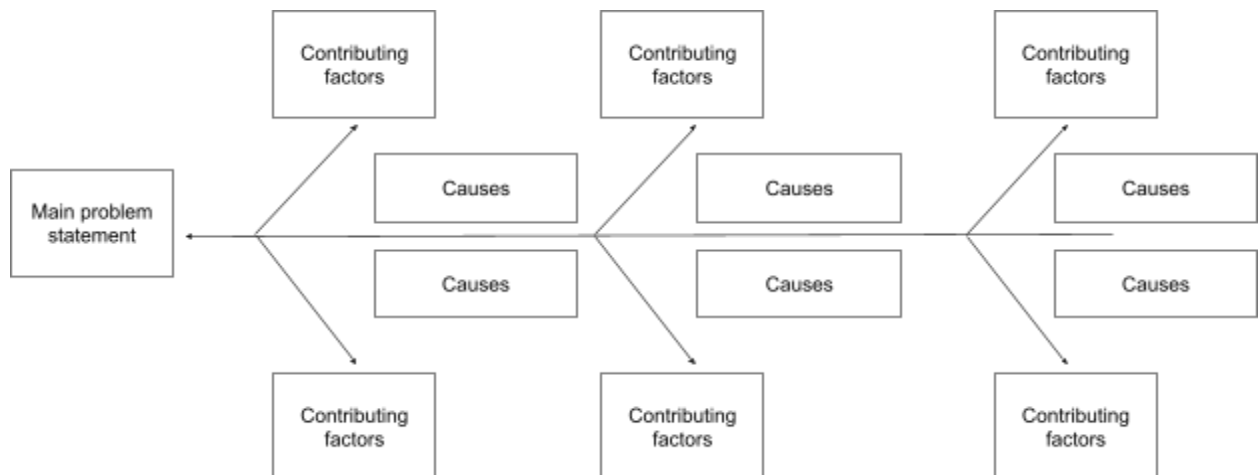
Listed below are two tools (fishbone diagram, 5 Whys) that can be used to conduct a root cause analysis. Please select one to complete in your root cause analysis and attach it with your submission of your corrective action plan.

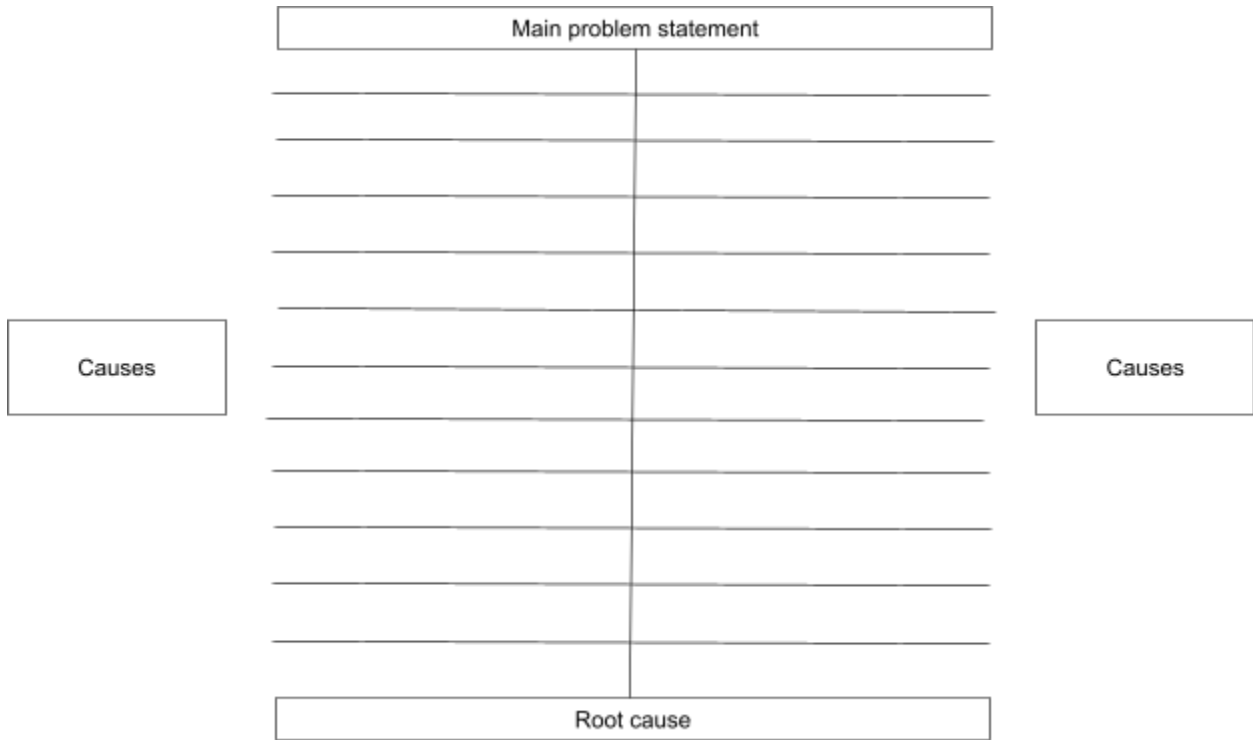
Once you have identified what you believe to be the root cause, it's important to confirm:

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

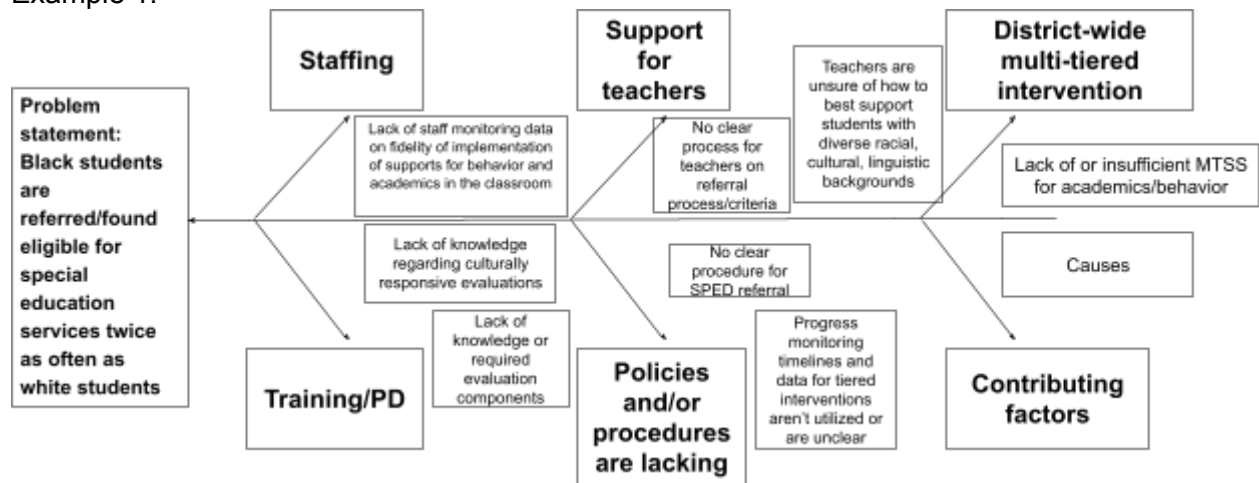
A fishbone diagram is a chart that can help better understand the contributing factors and causes of a problem. Starting with the problem allows us to break down the factors that contribute to the problem and consider the causes of each factor. Work as a team to brainstorm causes by asking "why does 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.



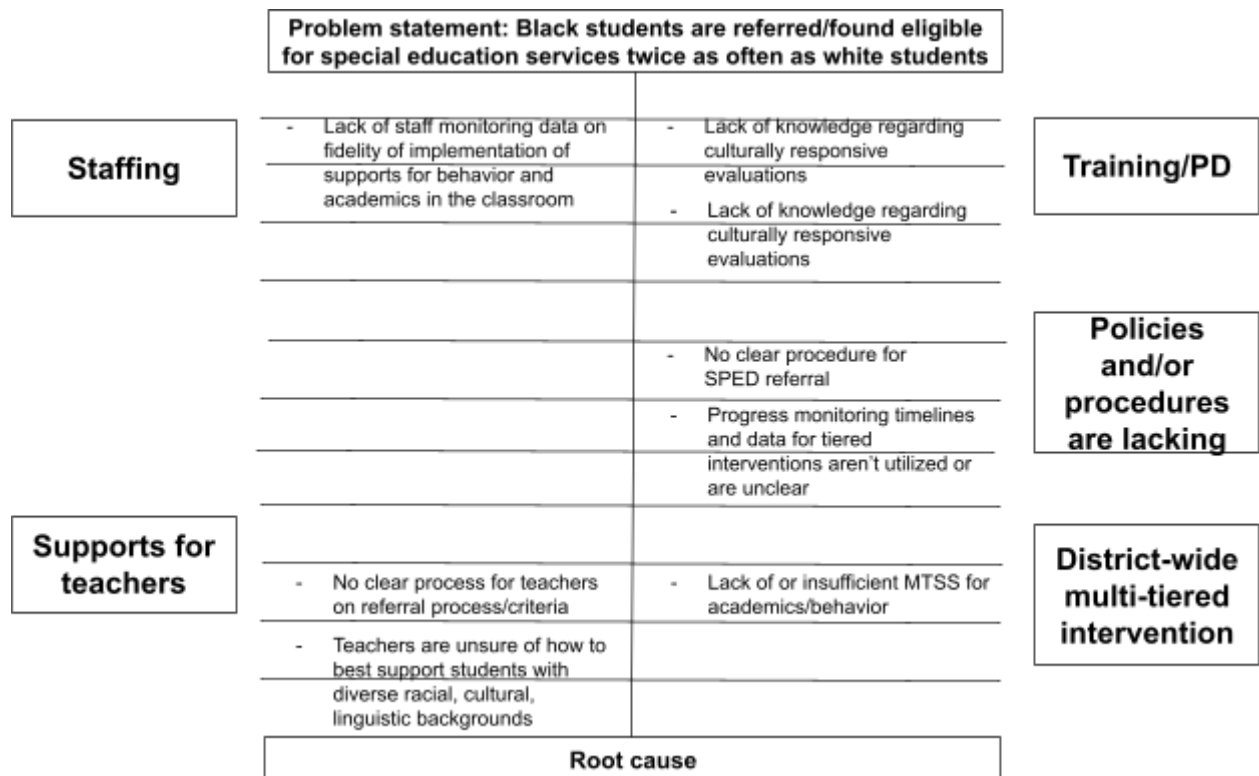


Fishbone Diagram Examples

Example 1:



Example 2:



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?

Why?

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

Root cause

The Five Whys Example

Define the problem: Hispanic students are referred/found eligible for special education services twice as often as white students

Why is the problem happening?

ELL elementary students are receiving tier 2 and 3 academic interventions more frequently than other students

Why?

Classroom teachers don't feel adequately supported to support ELL students in the classroom

Why?

There is a lack of understanding across the district of what interventions are available and how to effectively implement those interventions

Why?

Different schools are utilizing different criteria for selecting and monitoring interventions

Why?

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

Differences in type of intervention and fidelity of intervention results in inequitable referrals for special education at some schools in the district

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 9 is located [here](#). Please copy the document and use it for your corrective action plan submission.