



ISBE MONITORING
2020 ANNUAL REPORT:
CHICAGO PUBLIC SCHOOLS
CORRECTIVE ACTION PLAN



Executive Summary

The Illinois State Board of Education Monitor Annual Report (Report) highlights the progress and results of the Chicago Public Schools (CPS) Corrective Action Plan (Corrective Action Plan). The 2019 Annual Report provided background information regarding the Public Inquiry that was conducted by the Illinois State Board of Education (ISBE) during the 2017-18 school year.

The Report provides information and updates on engagement activities and the specific components of the Corrective Action Plan, which includes nine strands: **Strand A** – ISBE Appointed Monitor, **Strand B** – IEP Meetings, **Strand C** – Electronic IEP System Use, **Strand D** – Data Collection, **Strand E** – Procedural Manual and Guidance, **Strand F** – Budgeting, **Strand G** – Stakeholder Involvement, **Strand H** – Additional Training Plan, **Strand I** – Student Specific Corrective Action.

While the 2019 Annual Report covered the 2018-19 school year, the first year of the Corrective Action Plan, the 2019-20 school year was a distinctly different school year. The implementation of the Corrective Action Plan, therefore, was notably impacted. Overarching elements that notably impacted the Monitors' work include:

- **Public Act 101-0515.** Just prior to the 2019-20 school year, amendments to the Illinois School Code were signed into law. Included in the amendments was a new provision applicable only to CPS and mandates that CPS, in collaboration with its special education department, the Office of Diverse Learner Supports and Services (ODLSS), must publish any proposed changes to its special education policies, directives, guidelines, or procedures that impact the provision of education or related services to students with disabilities or the procedural safeguards afforded to them or their parents/guardians. The proposed change(s) must be published on CPS's public website no later than 45 days prior to adoption of the change(s). This new law affected release of ODLSS' 2019-20 Procedural Manual and other special education guidance documents (Strand E) and details/guidance regarding Student Specific Corrective Action (SSCA) (Strand I). Drafts of the proposed documents and guidance were posted on the CPS website on October 9, 2019, with the 45-day comment period ending on November 23, 2019.
- **Chicago Teachers Union Strike.** The Chicago teachers' strike occurred from October 17 through October 30, 2019. During this time, the Monitors could not conduct weekly meetings with ODLSS (Strand G), because all non-teaching CPS staff were assigned to CPS school sites or conducted other essential duties at CPS' office sites. All other meetings held at CPS schools and office sites, including Parent University sessions and the ODLSS Family Advisory Board (FAB; formerly known as the Parent Advisory Council/PAC) meetings, were canceled (Strands A and G). Meetings with school staff, such as IEP meetings and professional development sessions, were postponed or canceled as well (Strands B and H).
- **CTU-CPS Proposed Collective Bargaining Agreement (CBA) – SSCA provision.** During contract negotiations that occurred during the teachers' strike, the CTU advocated for new language that appeared in Article 21 (Special Education Teachers) of the newly proposed CBA and impacted the implementation of SSCA, which had been scheduled to commence at the end of the 45-day public comment period described above. On November 4, 2019, ISBE learned of the new language, proposing that CPS "agrees not to increase workload for bargaining unit members due to the Student Specific Corrective Action." This language remains within Article 21-16 of the CBA, which was ratified on November 20, 2019 and effective retroactive

to July 1, 2019 (the first day after the active period of the prior 2015-2019 CBA).


- **SSCA and Universal Enrichment Remedies (UER).** The language reflected in the new CTU-CPS agreement calls for centralized SSCA teams, and CPS thus commenced hiring procedures to staff the teams and implement SSCA. ISBE advised OSEP of the change in SSCA implementation due to the new CBA language. The new agreement also resulted in CPS' proposal to offer an automatic Universal Enrichment Remedy (UER) to students identified as those who were potentially adversely impacted during the 2016-17 and/or 2017-18 school years in areas identified by public inquiry. The majority of these students were previously identified as those who would automatically receive an SSCA meeting. While a student is typically only entitled to compensatory services after a delay or denial of services that caused a lack of expected progress has been established, UERs are being offered to streamline the SSCA process and promptly deliver services to students who may have been impacted by the violations identified in the ISBE Public Inquiry. UER meetings will be conducted via conference call. Details on UER and SSCA are included in the section below regarding Strand I on SSCA.
- **COVID-19.** Ensuring continuity of education to students during the coronavirus/COVID-19 public health emergency significantly disrupted the 2019-20 school year, and its challenges remain, especially for students with disabilities. ISBE engaged in an "all hands on deck" approach to develop guidance and support for Illinois' 852 school districts, and the Monitors contributed to this work. The Monitors also attended many meetings to track discussions between CPS, the CTU, and parents/guardians of students with disabilities concerning services to students that were impacted by the pandemic. During the suspension of in-person instruction, ISBE affirmed the local control of districts to develop plans for delivering remote learning. In the Spring, and continuing this school year, CPS decided that individual student Remote Learning Plans would be required for all students with IEPs or 504 Plans unless the IEP/504 Plan could be implemented exactly as it was written prior to remote learning. While the Monitors do not oversee CPS' remote learning, they nevertheless provide feedback to ODLSS. The 2019-20 compliance monitoring activities focused on the remaining and ongoing components of the Corrective Action Plan, with continued emphasis on Student Specific Corrective Action, which faced additional unexpected obstacles.
- **CPS Organizational Changes.** ODLSS faced a change in leadership with the departure of the prior ODLSS Chief. At the beginning of the 2019-20 school year, CPS hired a new ODLSS Chief, as well as a Deputy Chief. During the school year, other departures occurred, including the ODLSS Executive Director of Procedures and Standards, ODLSS Director of Procedures and Standards (and District Representative Manager), ODLSS Director of Related Service Providers, and ODLSS Manager of non-public facilities and charter schools. Additionally, the CPS Senior Assistant General Counsel who regularly met with ODLSS and the Monitors regarding the Corrective Action resigned in April, and while another CPS attorney regularly attends meetings with the Monitors, CPS has also assigned an attorney from an outside law firm to assist with the Corrective Action. Lastly, the ODLSS due process and procedures attorneys were moved from the ODLSS department to the CPS Law Department. Two of these attorneys were also quite involved in the Corrective Action but resigned in January and early March. As such, considerable amounts of time were required to rebuild rapport with new ODLSS leadership and educate the newcomers to the Corrective Action, especially Student Specific

Corrective Action, and the Monitoring function.

ISBE remains committed to ensuring that all students with disabilities receive a free appropriate education (FAPE) designed to meet their unique needs through public education in an equitable school environment where they are valued, supported, and encouraged.


Background

Illinois State Board of Education Public Inquiry

ISBE conducted a Public Inquiry regarding Chicago Public Schools' (CPS) special education policies and procedures. The Public Inquiry's 42-page [Final Report](#)  issued detailed factual findings over the course of several months during a transparent investigative process including evidence and testimony provided by parents, special education advocates, and Chicago Public Schools staff. The Final Report addressed and discussed findings regarding four primary issues identified earlier by the Public Inquiry Team:

- Whether **CPS's electronic IEP system**, either alone or in conjunction with CPS's Policies and Procedures, resulted in an unlawful denial or delay of required services or limitations on the required continuum of services to students;
- Whether CPS's **documentation and data collection requirements** resulted in unlawful denial or delay in the identification of eligibility or provision of special education and related services to students;
- Whether CPS's **budgeting system** resulted in unlawful denial or delay in the provision of special education and related services to students; and
- Whether CPS's **policies regarding transportation** resulted in an unlawful denial or delay in the provision of needed transportation services to students.

ISBE Monitoring Functions

The ISBE Public Inquiry Team issued an 11-page [Corrective Action Report](#)  in May 2018, which resulted in the appointment of an ISBE Appointed Monitor (Monitor) to implement ISBE's specified recommendations, serve as a liaison for special education between ISBE and CPS, and coordinate with ISBE staff to oversee compliance and technical assistance activities within CPS.

The monitoring function is not intended to supplant IEP team decisions, nor take the place of Parents' procedural remedies such as mediation, State-based complaints, and due process hearings. Rather, the monitoring team implements the recommendations pertaining to the specific issues identified by the Public Inquiry Team's findings and outlined in the Corrective Action Report. The team is also accessible to parents and CPS staff to address formal and informal concerns related to special education practices and procedures within CPS. Information of these formal and information concerns is utilized as one indicator for reviewing specific schools, CPS Networks, and departments for targeted corrective actions and CPS staff trainings.

CPS Demographic Information

Both the state of Illinois and CPS experienced a decline in student enrollment in the past year. In the 2019-20 school term, Illinois had approximately 1,984,519 students,¹ and 317,523 – roughly 16% - who were eligible to receive special education services through an Individualized Education Program (IEP).²

¹ Data pulled from the recent Illinois Report Card.

² In the 2018-19 school term, Illinois had approximately 2,001,529 students, with 289,903 – roughly 15% - eligible for IEP services.

CPS, which serves approximately 355,156³ students, is the largest school district in Illinois and the third largest school district in the United States. As of November 2019, CPS had approximately 51,691 - roughly 14% of its population – students eligible to receive special education services through an IEP.⁴

CPS' IEP-eligible students comprise roughly 16% of the total number of special education students served in the State of Illinois. While the State's percentage of students with IEP services increased from 15% to 16% despite less enrollment, CPS' percentage remained at 14% despite a decline in enrollment.

Corrective Action Plan Status Update

Strand A – ISBE Appointed Monitor

The Corrective Action Report indicated appointment of a Monitor to implement the provisions of and recommendations in the Corrective Action Plan. The first Monitor was appointed and commenced work on the Corrective Action Plan on July 2, 2018. ISBE appointed a second monitor who commenced work on November 18, 2019.

Status
<p>The Monitors currently oversee the compliance elements within each strand of the Corrective Action Report. ISBE continues to seek expansion of the monitoring team to assist with fulfilling obligations under the Corrective Action Plan.</p> <p>Both Monitors oversee and respond to inquiries and concerns submitted via the isbemonitor@isbe.net account. Both Monitors also have access to CPS' SSM system to independently monitor the system, access district reports regarding students with disabilities, and review CPS student IEPs throughout the school year. The level of access provided to the Monitors is as an "Administrator," meaning the Monitors have access to all IEP content, evaluations, and most SSM-based District Reports. The Monitors are also seeking additional reports from CPS to track critical information on compensatory education meetings, requests and referrals for special education evaluation, and SSCA meetings.</p> <p>Rather than separating and overseeing specific components of the Corrective Action Plan, the Monitors work closely together to ensure consistent communication with stakeholders and united implementation of the Plan.</p> <p>The Monitors attend numerous meetings on a weekly, monthly, and quarterly basis as described further under Strands B and G of this Report.</p>

Strand B – IEP Meetings

ISBE requires that members of the IEP team who are necessary to make a decision be present at every IEP meeting unless parents/guardians execute a valid excusal. The Corrective Action Report requires the physical presence of the LEA representative – the individual with the authority to bind the school district – at the IEP meeting. The Corrective Action report also required that certain training occurred regarding facilitating IEP meetings. Last year's Annual Report described the trainings that addressed IEP meeting facilitation, IEP development, and data-based team decisions.

³ Number reflects student numbers at the start of the 2019-20 SY.

⁴ In the 2018-19 school year, CPS had 372,214 students, with 52,530 (roughly 14%) eligible for IEP services.

Status

The Monitors attended IEP and Remote Learning Plan meetings during the 2019-20 school year, however, the Chicago teachers' strike and the mandatory remote learning period from mid-March through the present impacted IEP meetings and thus the Monitors' attendance.

The Monitors also attended a number of Case Manager meetings, professional development meetings/trainings, Network meetings, and individual parent/guardian meetings. The Monitors attended some of these meetings together as well as separately. Again, the teachers' strike, shelter-in-place, and remote learning periods naturally affected the frequency of these meetings. In total, the Monitors attended the approximate number of meetings as follows:

- **IEP or Remote Learning Meetings** **36**
- **School Visits / School Staff Meetings**
School-Specific Professional Development Sessions **18**
- **ODLSS Case Manager Meetings / Network Meetings** **7**
- **Professional Development Meeting Observations** **2⁵**

For more details on these and additional meetings, see **Strand G – Stakeholder Involvement**.

Strand C – Electronic IEP Use

The Corrective Action Report outlined ISBE's requirement that CPS allow IEP teams full access to the SSM electronic IEP system (SSM) during the IEP meeting. The full access allows IEP teams to enter decisions and information in the electronic system as determined by the team.

Status

As detailed in last year's Annual Report, certain sections in the SSM system could not be accessed until a specific action was undertaken by an administrator in CPS or until a set period of time had elapsed. These restrictions were removed during and after the Public Inquiry. ISBE personnel confirmed removal of the SSM system "locks and blocks," and the inclusion of the IEP Notes page, during its review and approval of the revision to CPS' 2018-19 Procedural Manual and during the Public Inquiry meetings convened on May 18, 2018, June 1, 2018, and June 20, 2018. One locked function continues to exist in the SSM system. Approval continues to be needed prior to student placement in an environment where the student is removed from the general education placement for 100% of the school day, called a Separate Day School (SDS) placement by CPS. The Monitors continued to ensure this locked function does not conflict with the IDEA and Illinois regulations during the 2018-19 school year.

⁵ As reported last year, during the 2018-19 school year the Monitor attended IEP meetings based upon multiple measures, including requests by a parent/guardian, District Representative (DR), or school-based staff. The Monitor also selected meetings to attend as compliance checks or based on concerns reported via written complaints or emails, including anonymous complaints. Total meetings attended during the 2018-19 school term was approximately 66.

The remaining component of this Strand that the Monitors continue to review is periodic IEP reviews to ensure IEP teams have the ability to fully access the IEP system. The Monitors conduct IEP reviews for all students named in a parent/guardian or staff report/complaint. IEP reviews are also conducted prior to every IEP or Remote Learning Plan meeting the Monitors have been requested to attend. During the 2020-21 school year, the Monitors are developing new data points to broaden their scope of IEP reviews and attendance at IEP and Remote Learning Plan meetings.

The Monitors also have the ability to review IEP audit logs to ensure that a variety of IEP team members are accessing and/or editing the appropriate sections of an IEP, as well as to ensure that IEP drafts are worked on and provided to Parents in advance of the meeting as required by the *Illinois School Code*.

Additional details regarding IEP development are included in Strand H – Additional Training Plan.

Strand D – Data Collection

The remaining component in Strand D that the Monitors continue to address is a review of the expectation that IEP teams continue to use robust and detailed data to support their decisions.

Status

CPS provided extensive data-based training sessions prior to the 2019-20 school year, including sessions focused on "Progress Monitoring in Special Education," "Using Data to Address Challenging Behavior," and "Special Education Teacher 101 Tool Box." Since that time, CPS has developed more robust training on qualitative and quantitative data collection for Functional Behavior Assessments and Behavior Intervention Plans.

Qualitative and quantitative data is defined and described in the ISBE-provided teacher training sessions and parent workshops that remain posted on the ISBE Monitor website. Training sessions on data-driven decisions continue to be an ongoing area of focus to better equip IEP teams with detailed guidance to write high quality IEPs and to fully understand and integrate the critical purpose of progress monitoring.

Conversations regarding data collection and progress monitoring remain a priority within the current context of remote learning. CPS references and reports to follow ISBE and USDOE guidance regarding best practices regarding remote learning, emphasizing collaboration with other teachers, related service providers, and parents to ensure accessibility of education via students' home environments and to discuss and analyze how to adapt remote learning to individual student needs and circumstances.

Strand E – Procedural Manual and Guidance

CPS' Procedural Manual, with appropriate translations, is to be updated as necessitated by changes to use of the SSM system or new law, and it must be publicly posted on the CPS website, with printed copies available upon request.

Status

As described in the Executive Summary, amendments to the Illinois School Code were signed into law just prior to the 2019-20 school year. The amendments include a new provision applicable only to CPS and mandates that CPS, in collaboration with its special education department, the Office of Diverse Learner Supports and Services (ODLSS), must publish any proposed changes to its special education policies, directives, guidelines, or procedures that impact the provision of education or related

services to students with disabilities or the procedural safeguards afforded to them or their parents/guardians. The proposed change(s) must be published on CPS's public website no later than 45 days prior to adoption of the change(s).

This new law affected CPS' release of the [2019-20 ODLSS Procedural Manual](#) and other special education guidance documents. Drafts of the proposed documents and guidance were first reviewed by and discussed with the Monitors and the Advocate representatives. The draft documents were posted on the CPS website on October 9, 2019, with the 45-day comment period ending on November 23, 2019.

The prior ODLSS Procedural Manual was available in English, Spanish, Urdu, Polish, Arabic, and Chinese. Appropriate translations of the 101-page 2019-20 Procedural Manual were delayed by the public comment period but are expected to be published soon.

CPS revised portions of the Procedural Manual pursuant to public feedback and input prior to its final release. Other guidance and forms finalized are reflected below and can be found on the ODLSS website's "[Policies and Procedures](#)" page.

- ODLSS Section 504 Procedural Manual [[ENGLISH](#)]
- IDEA Procedural Manual [[ENGLISH](#)]
- Assistive Technology (AT)
[[ENGLISH](#) | [SPANISH](#) | [URDU](#) | [POLISH](#) | [ARABIC](#) | [CHINESE](#)]
- Extended School Year (ESY)
[[ENGLISH](#) | [SPANISH](#) | [URDU](#) | [POLISH](#) | [ARABIC](#) | [CHINESE](#)]
- Paraprofessional Support (IEP and Section 504 Plan)
[[ENGLISH](#) | [SPANISH](#) | [URDU](#) | [POLISH](#) | [ARABIC](#) | [CHINESE](#)]
- Specific Learning Disability (SLD)
[[ENGLISH](#) | [SPANISH](#) | [URDU](#) | [POLISH](#) | [ARABIC](#) | [CHINESE](#)]
- Transportation (IEP Section 15 and Section 504 Plan – Transportation) [[ENGLISH](#)]
- Service Animal Guidelines [[ENGLISH](#)]
- Parent/Guardian Authorization to Send IEP Documents and Related Information via E-Mail
[[ENGLISH](#) | [SPANISH](#)]

Strand F – Budgeting

The Corrective Action Report directed that CPS provide ISBE with the allocation/staffing formula developed for the 2018-2019 school year, and that CPS establish an appeals process that included specific documentation required from schools and timelines of expected response. These requirements were met for the 2018-19 school year. The Monitors maintain the authority to override appeal decisions if clear evidence exists that the decisions will result in an unwarranted denial of services.

Status

In March/April 2020, ODLSS revised their staffing allocation methodology for the 2020-21 school year, and they readjusted the timeline for the position appeals process. ODLSS and ISBE participated in meetings and presentations to discuss the revisions and engage in Q&A sessions regarding position allocations and appeals as follows:

ODLSS – ISBE meetings/calls:	4/2, 4/9, 4/21, 4/23, 4/24
Internal ISBE meetings/calls:	4/23, 4/30, 5/7
ODLSS-CTU-ISBE meetings:	5/5, 5/12, 5/26, 6/2
ODLSS-Parents (FAB)-ISBE:	5/6, 5/14
Joint Stakeholders meetings:	5/21, 6/18, 7/16

ODLSS reported that the number of staffing appeals in prior years was indicative of existing formulas that needed to be revisited. ODLSS updated the staffing methodology with the intention of reinforcing equitable resources across the district and increasing flexibility in school scheduling.

The allocation methodology is complex and challenging to describe, however, some revisions include:

- **Separate Classroom Special Education Teacher Allocations⁶**
Improvement: separate class minutes in student IEPs are now analyzed for three grade bands versus two. The lowest and highest amount of student IEP minutes are identified for each grade band, and allocations are based on the highest amount of minutes to ensure the most effective teacher coverage.
Prior Grade Bands: K-3 and 4-8
New/Current Grade Bands: K-2, 3-5, 6-8
Note – This initial step in analysis is for budgeting baseline purposes, however, ODLSS committed that it would be flexible with allocations. For example, ODLSS will also analyze minutes within each grade band to better understand what minutes look like for each academic area to further determine how many teachers are able to realistically cover all IEP minutes.
- **Rounding up Allocations**
Improvement: ODLSS now rounds up position allocations when the total is x.01 and up. Prior to this year, ODLSS did not have a stable “round up” number and relied solely on math ratios to determine how many positions a school would be granted.

⁶ This does not include teachers for classrooms for students who require a significantly modified curriculum (“cluster” or “low incidence” classrooms). These classrooms are at specific CPS schools staffed with a special education teacher and paraprofessionals.

Prior example: 8.01 allocations equaled 8 teachers

New/Current: 8.01 allocations rounded up to 9 teachers

Note – this allows for greater flexibility in scheduling teachers to additional settings/classrooms, and it also allows for flexibility to try co-teaching models during certain class periods without having to first request an additional .5 (PT) or FT teacher position to put the model in place.

- **Additional SECA Allocations for Cluster Programs**

Improvement: ODLSS will be allocating additional classroom-based (not IEP-based) special education classroom assistants (SECA) for its cluster classrooms to ensure greater SECA support is in place for teachers who teach students who require a significantly modified curriculum.

Prior Classroom SECA allocations:

- Classrooms with moderate support needs (Intellectual Disabilities/Autism): these classrooms automatically received one classroom SECA
- Classrooms with intensive support needs (severe/profound intellectual Disabilities/Autism): these classrooms automatically received two classroom SECAs

New/Current SEA allocations:

- Moderate classrooms: two SECAs are now assigned to these rooms
- Severe/Profound classrooms: three SECAs are now assigned to these rooms

Note – Classroom-based SECAs are expected to cover shared (not dedicated) SECA minutes via student IEPs when feasible, but if the burden becomes too cumbersome, schools will continue to request additional SECA positions when IEP-based SECA minutes increase. For new SECA position requests, IEPs and SECA schedules are analyzed to determine appropriate coverage.

Along with the budgeting details described above, the Monitors are focusing on the impact to certain budgeting policies has on school-based IEP teams. CPS policy requires that a determination of compensatory education services will be funded via the school's existing budget. The concern is that this budgeting expectation may impact school administration and the IEP team's objectivity when determining eligibility of a student to receive compensatory education.

For CPS' FY 2020, position requests were submitted as follows:

- 296 **special education teachers**, of which, ODLSS approved 232 requests and denied 64 requests.
- 1063 **paraprofessionals**, of which, ODLSS approved 846 requests and denied 217 requests.

Beginning on May 4, 2020 and ending May 21, 2020 the post-budget appeals process commenced. During the post-budget appeals process appeals were submitted as follows:

- 89 **special education teachers**, of which ODLSS approved 25 and denied 64.

- 137 **paraprofessionals**, of which, ODLSS approved 41 and denied 96.

Beginning on August 13, 2020, the FY21 Position Request process commenced. Eighteen schools that submitted position requests in August were denied in the May appeal, which is 33.96% of schools who resubmitted position requests.

As of September 14, 2020, the FY21 position requests were submitted as follows:

- 40 **special education teachers**, of which CPS approved 16 and denied 19; 5 position requests are “pending review.”
- 103 **paraprofessionals**, of which, CPS approved 50 and denied 42; 11 position requests are “pending review.”

The Monitors are copied on ODLSS emails to schools regarding appeals decisions, and they have access to the document that tracks requests and related materials in “real time.” The Monitors did not override any appeals decisions for Fiscal Year 20, but they did engage in several meetings and conversations to provide guidance and insight regarding scheduling, maximizing use of assigned staff, and LRE expectations and best practices via ISBE’s regulations on class size. The Monitors continue to review the current FY21 position requests and appeals.

Strand G – Stakeholder Involvement

The Corrective Action Report addresses the expectation that CPS will engage with various stakeholder groups at regular intervals. Stakeholders include parent groups, advocate representatives, CPS personnel, the CTU and SEIU local unions, and others.

Status

Parents/Guardians

The Monitors have worked this year to engage stakeholders in a variety of ways outside of the monthly Joint Stakeholder Meetings. The Monitors attended all regularly scheduled monthly meetings of the newly named Family Advisory Board (FAB). Attendance at these in-person meetings averaged between twenty to thirty attendees. Participants included those who attended frequently as well as new attendees at each session. As the COVID-19 related shutdown began in March the in-person meetings were cancelled, and the FAB executive committee decided to hold virtual meetings. Attendance at these virtual meetings grew to over sixty attendees for the two meetings in May and forty-six attendees for the monthly meeting in June. The Monitors continue to look for ways to engage parents and guardians of special education students.

One of the objectives of the FAB executive committee is to increase the number of special education parent groups at the school level. The Monitors have attended a few Local School Council meetings when the FAB believed that assistance was needed in highlighting the positive rapport created between these groups and school administrators. The Monitors, in collaboration with the FAB executive committee, are planning a special meeting for the FAB membership to meet with ISBE personnel in September. The Monitors are also working with the ODLSS Parent Involvement Specialists and ODLSS District Representatives to schedule training opportunities for parents/guardians of special education students. Ongoing concerns for parent/guardian training for the upcoming months include wide dissemination of the parent/guardian presentation regarding the Student Specific Corrective Action process.

Advocate Groups

The Monitors continued to engage with advocate groups throughout the school year. In December 2019, the Monitors held a special meeting with a group of Advocate representatives to introduce the second Monitor and hear the representatives' perspectives regarding monitoring successes and areas of continued concern. In addition to the monthly Joint Stakeholder Meetings, the Monitors engaged with the newly formed and renamed advocate group, the Special Education Advocacy Coalition of Chicago (SPEACC). During these meetings, the Monitors participate in collaborative planning to broaden the scope of monitoring activities based upon specific feedback and suggestions. This stakeholder feedback helps identify ongoing special education issues within CPS and highlights data/trends that may impact students with disabilities.

The Chicago Teachers Union (CTU)

The Monitors continued engagement with the Chicago Teachers Union during the 2019-20 school year. At the beginning of the school year, the Monitors participated in the monthly joint meetings between ODLSS, the CPS Law Department, and the CTU's special education working group. When the COVID-19 shutdown began, and CPS move to a remote learning platform, this group met weekly to discuss ongoing concerns that were unique to this remote learning. The Monitors will continue this partnership throughout the 2020-21 school year.

OLDSS

The Monitors and ODLSS have maintained the weekly check-in meetings throughout the 2019-20 school year and this past summer. This working group experienced notable changes this year as the result of key departures within ODLSS, the CPS Law Department, and the addition of a second Monitor. Topics for these weekly meetings include addressing ongoing challenges to SSCA implementation, the newly revised special education budget allocation for special education teachers and paraprofessionals (i.e. special education classroom assistants/SECAs), school-specific concerns, and training needs via Monitor observations at IEP and Remote Learning Plan meetings.

The Monitors continue to attend weekly ODLSS District Representative Meetings to learn about current issues, preview and weigh in on professional development and Case Manager Meeting materials, engage with other ODLSS personnel (Special Education Administrators, Related Service Providers, School Assignment Specialists, etc.), and offer assistance in addressing school-based issues and conflicts.

Other Special Education Stakeholder Engagement

The Monitors continue to address concerns submitted via the isbemonitor@isbe.net email address. Any individual or group with information regarding CPS-related special education concerns is encouraged to utilize the Monitor email address to highlight those concerns, or invite involvement from the Monitoring team, such as to attend IEP or Remote Learning Plan meetings. Anonymous concerns via the Monitors' website are investigated despite the potential limitations given the anonymity of the reports. Generally, and out of courtesy and collaboration, investigations are discussed with ODLSS during aforementioned weekly check-in meetings.

One of the goals of the monitoring function for the 2019-20 school year was to increase stakeholder engagement. The addition of a second monitor in November 2019 provided additional opportunities to meet with a wider range of stakeholders. The monitors were able to provide technical support, guidance, and training to individuals and groups. The table below summarizes the number of meetings the Monitors attended this past school year and describes the stakeholder groups and related number of meetings.

Type of Stakeholder Meeting	Number of Meetings Attended During the 2019-20 School Year
Office of Diverse Learner and Supports Weekly Check-In Meetings	36
Family Advisory Board Meetings	16
Meetings with Parents Outside of IEP Meetings	14
IEP Meetings	37
Meetings with Advocate Groups	4
Joint Stakeholder Meetings	9
Chicago Teachers Union/ ODLSS/ISBE Meetings	16
District Representative Training Meetings	34
Meeting with School-Based Personnel	20
Parent University Meetings	8

Strand H – Additional Training Plan

CPS collaborates with the Monitors to continue training for staff regarding State and federal special education laws.

Status
The Monitors continue to consider ways to improve communication and expertise among the various stakeholders within CPS, and development of a cohesive training plan continues to be a priority. Much of the focus for the 2019-20 school year was to

create training materials for parents/guardians related to the Student Specific Corrective Action (SSCA) process. The training deck for parents was completed in early March 2020 and the first parent training was scheduled for March 21, 2020 at the ODLSS Spring Parent Expo. Unfortunately, the shutdown due to COVID-19 occurred on March 17, 2020, and all in-person training was cancelled.

As focus shifted from in-person learning to remote learning, the Monitors looked to support and provide training opportunities in the new virtual format. Initially, all previously scheduled in-person meetings were cancelled, but as the need grew for parents to receive timely information, the Monitors were able to provide parent training through the Family Advisory Board (FAB) meetings. The FAB meetings switched to a virtual format in April 2020, and this proved to be a successful platform for the meetings. The Monitors and FAB Executive Committee held a joint meeting on September 15, 2020. The Monitors provided background on the Public Inquiry and Corrective Action for newcomers and described their roles and expectations in relation to CPS' processes and provision of special education services. The ISBE Director of Special Education also attended and provided guidance on navigating the ISBE Special Education site and other web pages for resources and ideas regarding remote learning and special education generally. The meeting concluded with a 30 minute question and answer session.

Training for the 2020-21 school year will include parent trainings on CPS Remote Learning Plans and the SSCA process as recently updated. Parent trainings will be recorded and posted on the ODLSS and ISBE Monitor websites. The Monitors also aim to provide specialized training to educational surrogates of students in foster care that have been identified as qualifying for a Universal Enrichment Remedy or automatic SSCA meeting. This specialized training is being developed to ensure that parents and caregivers have the knowledge to make the best decisions on behalf of their students.

As the Monitors and ISBE continue to learn more about what impact COVID-19 and remote learning have on special education students, the specific needs for continued training opportunities will become apparent. The Monitors will continue to work in the area of family, district, and community outreach to assist with identification of the stakeholder groups most in need of training and identification of targeted topics for the training.

Strand I – Student Specific Corrective Action

Students whose services were delayed or denied as a result of practices that were inconsistent with the IDEA were to be identified and offered opportunity to remedy the delay or denial, when appropriate. Originally, CPS was to identify and provide an individual remedy to students after analysis of the students' present levels and consideration of possible delay or denials. However, based upon a Universal Enrichment Remedy, described in more detail below, CPS is streamlining its approach to identify and provide an individual remedy to specific students who were potentially impacted by issues identified in the Public Inquiry.

The most recent draft of the [SSCA Guidelines](#) and related procedures are currently posted on the CPS website for public comment; the public comment period ends on September 21, 2020. Consequently, it should be recognized that some of the procedures described below are subject to change based on public comment and subsequent discussions with CPS, the CTU, and Advocate representatives.

Status
<p data-bbox="787 701 919 730" style="text-align: center;"><u>Overview</u></p> <p data-bbox="289 737 1411 1035">The purpose of Student Specific Corrective Action (SSCA) is to identify and provide a remedy for students with disabilities who were adversely impacted during the 2016-17 and/or 2017-18 school years by special education procedural changes and “locks and blocks” in the electronic IEP system in one or more of the five areas identified by the ISBE Public Inquiry. CPS is presently screening and hiring SSCA staff members. CPS also created a specific site for SSCA within its Special Education web page and is named “ISBE Student Specific Corrective Action.” This page contains information on SSCA including an overview, current draft documents open for public comment, archived documents, parent notices, and SSCA/ODLSS contact information.</p> <p data-bbox="289 1073 407 1102">Timeline</p> <p data-bbox="289 1108 1411 1203">SSCA has faced unexpected obstacles since its inception and continued rollout. The timeline below summarizes the key events that impacted SSCA and required significant revisions over the past two school years.</p> <p data-bbox="764 1241 1049 1270" style="text-align: center;">2018-19 School Year</p> <ul data-bbox="326 1308 1395 1686" style="list-style-type: none"><li data-bbox="326 1308 1395 1402">• Summer 2018 – ISBE & U.S. Department of Education’s Office of Special Education Programs (OSEP) determines IEP teams should conduct SSCA Meetings to determine appropriate remedies.<li data-bbox="326 1430 1395 1493">• October 16, 2018 – Advocates request written guidance and clarification from USDOE regarding IEP team involvement.<li data-bbox="326 1520 1395 1583">• January 31, 2019 – OSEP responds to request, reiterating that IEP Teams are “well positioned” to make determinations of SSCA.<li data-bbox="326 1610 1395 1686">• Spring 2019 – Discussions resume regarding SSCA process, rollout, and training.

- **Spring/Summer 2019** – ISBE & CPS develop a process to identify students potentially impacted during the 2016-17 and 2017-18 school years.
 - The process was discussed with stakeholders to obtain additional input.
 - Training sessions were developed for school staff and parents.
- **July 2019** – CPS posts SSCA details on its main and ODLSS web pages

2019-20 School Year

- **July/August 2019** – Principals, Assistant Principals, and Case Managers are trained on SSCA guidelines and processes for IEP teams.
 - CPS begins to identify potentially impacted students.
 - CPS, ISBE, and stakeholders begin to draft SSCA letters to parents/guardians.
- **September 2019** – CPS sends 3 versions of SSCA letters to parents/guardians:
 - Letter A is sent to parents/guardians of students identified by CPS data run as being potentially impacted and requiring an SSCA meeting;
 - Letter B is sent to all other parents/guardians of active/current students with disabilities with information on the SSCA process; and,
 - Letter C is a notice to all CPS parents/guardians regarding the SSCA process via website notification and a “backpack notice.”
- **September 2019** – ISBE and CPS hold SSCA trainings for parents/guardians at six Parent University sessions, including two evening sessions.
- **September 2019** – CPS sends Principals a list of students who currently attend their school and were identified by ODLSS as students potentially eligible for SSCA.
- **October 1, 2019** – The expected rollout of school level SSCA meetings is delayed by Public Act 101-0515, which requires CPS to publish all new guidelines/procedures (e.g. SSCA) for a 45-day public comment period prior to finalization.
- **October 17-30** – Chicago Teachers Union strike period.
- **November 2019** – CPS-CTU bargaining team develops bargaining agreement language stating that CPS “will not increase workload for bargaining unit members due to the Student Specific Corrective Action.” As such, CPS commences hiring procedures to staff centralized SSCA

teams to implement SSCA. ISBE advises OSEP of the change in SSCA implementation due to the new language

- **November/December 2019** - CPS, ISBE, CTU, Parents, and Advocate representatives engage in discussions regarding new ways to implement SSCA and hold SSCA meetings since CTU members (i.e. school-based IEP teams) cannot be utilized given the new CPS-CTU agreement.
- **December/January 2019/20** – New SSCA implementation process.
 - CPS-proposed Universal Enrichment Remedy (UER) process accepted; further development continues.
UER described in detail below.
 - Previous list of students who were potentially impacted by issues identified in the Public Inquire is reviewed to identify students now automatically eligible to receive a UER.
 - Monitors assist with individual reviews of 1,343 IEPs and documents for students who were reported by their schools to have received services despite identification of those who were possibly denied services and thus eligible for a UER⁷.
- **February 2020** – CPS sends updated letters to parents/guardians:
 - Letter 1 is sent to Parents whose children were identified as eligible to receive a UER.
 - Letter 2 is sent to Parents who are automatically entitled to have an SSCA meeting to determine if their child was impacted during the 2016-17 and/or 2017-18 school years.
 - Letter 3 is sent to all other CPS Parents informing them of the SSCA process and how to request an SSCA meeting if they believe their child was impacted via issues identified in the Public Inquiry.
- **March/April 2020** – During COVID-19 (shelter-in-place requirements, remote learning days, etc.), CPS continues to seek candidates to staff centralized SSCA teams. All ISBE, CPS, and stakeholder focus shifts primarily to remote learning, with continued conversations and adjustments to proposed SSCA guidelines and procedures. CPS' timeline during this period follows:
 - **March 17-30:** Act of God Days per Illinois declaration
 - **March 31, April 1-3:** Remote Planning Days (via ISBE)
 - **April 6-10:** CPS Spring Break
 - **April 13:** First day of remote learning for CPS

Universal Enrichment Remedies (UER)

A UER is an automatic remedy that will be offered to students identified as potentially adversely impacted during the 2016-17 and/or 2017-18 school years in areas identified by public inquiry. The majority of these students were previously identified as those who would automatically receive an SSCA meeting. While a student is typically only entitled to compensatory services after a delay or denial of services that caused a lack of expected progress has been established, UERs are being offered to streamline the

⁷ 636 students were removed from the list when delivery of services could be confirmed via IEPs and other documents.

SSCA process and deliver services to students who may have been impacted by the violations identified in the ISBE Public Inquiry.

UER meetings will be conducted via conference call. A centralized ODLSS SSCA team will notify parents/guardians via U.S. mail, email, and/or telephone to inform them of their eligibility for a UER and schedule a phone conference to discuss UER options.

NOTE: The areas and years for which the student has been identified to receive a UER will be specified on the Notice of UER Conference Call document. If the parent/guardian believes that their child was impacted in another SSCA area or another year identified in the ISBE Public Inquiry Report, the parent/guardian may request an SSCA meeting.

Identification of Students Eligible for a UER

With ISBE approval, CPS utilized information from their electronic system (via SSM data pulls) to identify a class of students who were potentially impacted in three areas identified as problematic by the Public Inquiry: paraprofessional support, transportation as a related service, and eligibility for extended school year (ESY) services. For these three areas, data was pulled via the following parameters:

- A student’s 2015-16 IEP was the starting point of analysis.
- If the student’s 2015-16 IEP indicated eligibility for a particular support/service identified by the Public Inquiry, then the student’s 2016-17 and 2017-18 IEPs were then reviewed to see if those services were removed. **See Fig. 1**

Fig. 1

Area	Criteria
Extended School Year	The student had ESY on their 2015-16 IEP but did not have ESY on the last finalized IEP in the 2016-17 and/or 2017-18 school year(s).
Transportation	The student had transportation on their 2015-16 IEP but the service was not on the 2016-17 and/or 2017-18 IEP(s) and the student was not enrolled in his/her neighborhood school.
Paraprofessional	The student had paraprofessional support on their 2015-16 IEP but the service was not on the 2016-17 and/or 2017-18 IEP(s) AND paraprofessional support was not noted in Section 10: Accommodation & Modifications or Section 11: Specialized Instruction (goal). OR The student’s record includes a paraprofessional justification form that was left in draft during the 2016-17 and/or 2017-18 school year(s).
Specific Learning Disability	The student’s record includes a Learning Environment Intervention’s (LEI) or Learning Environment Screening (LES) that was left in draft during the 2016-17 and/or 2017-18 school year(s).

NOTE: The review of the 2016-17 and 2017-18 IEPs was *not* conducted to determine whether the IEP team made the “correct” data-based decision or the student was harmed; instead, the review examines whether a “lock or block” within the system prevented the team from recommending services that the student may have otherwise been eligible to receive.

Two IEP-related areas were identified as potentially problematic by the Public Inquiry as challenging to include in the CPS data run: (1) an improper delay or denial of placement of students in a therapeutic day school setting (100% removal from the general education setting); and (2) identification of students eligible under the disability category of specific learning disability (SLD) (see **Fig. 1** regarding the initial data capture). To address this problem, the notices and letters encouraged Parents to request an SSCA meeting if they believe their child was impacted in these areas.

CPS identified approximately 10,000 (i.e. about 1 in 5 students with disabilities) as qualifying for a UER.

UER Services and Funding UER

UERs aim to provide options that include enrichment in the areas of academic support and tutoring, social/emotional learning, arts and culture activities, and/or physical activity and fitness programming. Depending on the service, the enrichment remedies may be provided before/after school and/or during the summer.

The amount of the remedy is based on the area identified by CPS in which the student was potentially impacted. If a student is identified by CPS as potentially impacted in more than one area, the amounts will be added together, up to a maximum UER of \$4,000.00 per school year. **See Fig. 2.**

Fig. 2

CPS Identified Area	Remedy
Extended School Year (ESY)	Parent is entitled to a maximum of \$800.00 of UER per academic school year the student was impacted.
Transportation - student attended school	<p>A. Mileage Reimbursement at the IRS approved rate 2017 = 53.5 cents 2018 = 54.5 cents</p> <p>B. CTA Reimbursement</p> <p>C. Cab or Ride Share Reimbursement</p> <p>Parents are required to submit the <i>Transportation Affidavit</i> reflecting the mileage that was driven or the expenses incurred during the impacted school year. Parents are entitled to a reimbursement up to the maximum of \$4,000.00 of UER per academic school year the student was impacted.</p>
Transportation - student missed 10 or more consecutive days due to a lack of transportation	\$112.50 of UER for every 5 days missed. At a minimum, parent is entitled to \$225 of UER. The maximum is \$337.50 of UER per academic school year the student was impacted.
Paraprofessional	Parent is entitled to a maximum of \$2000.00 of UER per academic school year the student was impacted.
Specific Learning Disability (SLD)	Parent is entitled to a maximum of \$4000.00 of UER per academic school year the student was impacted.

Parents may select a provider from a CPS Approved List of Providers (a link to the menu of these providers is given to parents/guardians with the UER notification). Parents may also request a provider of their choice, and if the provider is not on the CPS Approved List of Providers, the provider can complete the CPS vendor application process and be reimbursed upon approval. Alternatively, the parent can become a parent vendor, pay the provider, and be reimbursed by CPS.

Parents may use a portion of their UER amount for transportation costs, if applicable, to and from the UER location. Transportation costs will be reimbursed upon submission of proper proof, using the IRS-approved mileage rate.

CPS will record and track all vendor choices and services. Parents/guardians will also be allowed to change UER providers after the service has begun. CPS will be notified of the change, so they are able to note any concerns or issues regarding vendors and/or the delivery of services.

If parents/guardians are not in agreement with the UER options and/or request remedies for additional SSCA areas or years, the parent should request a formal SSCA meeting.

NOTE: Any parent who requests a SSCA meeting will not be denied the UER originally offered to the student in the event an SSCA meeting results in a determination that no denial/delay occurred or that the student made expected progress.

Additional Identification of Students for Automatic SSCA Meetings

CPS agreed to include an additional category of students who were potentially impacted by an area identified by the Public Inquiry: delays or denials in services due to the budget appeals and position request processes during the 2016-17 and/or 2017-18 school years. CPS identified both active and inactive students in this category for whom an automatic SSCA meeting will be offered.

SSCA Meetings

If a parent/guardian did not receive notification of a UER conference call or an automatic SSCA meeting, they may request an SSCA meeting based on the following criteria:

- The student was enrolled and attended a CPS school during the 2016-17 and/or the 2017-18 school year(s). This includes students placed at a therapeutic day school by CPS via the student's IEP. This also includes students who have since graduated or dropped out of school.
- The student has not already waived his/her claims as a result of a due process hearing order, settlement agreement, and/or mediation agreement.
- For budget-related issues, the student has not already received a compensatory education meeting that addressed the same issue. CPS will verify that the student attended a school that submitted a budget appeal for a paraprofessional or special education teacher during the 2016-17 or 2017-18 school year, and that the student had services from that provider on his/her IEP at that time.

SSCA Meeting Teams

The centralized SSCA Teams will consist of a special education teacher, who may also serve as district representative, a general education teacher, and the parent/guardian. The special education and general education teachers are hired by CPS to participate in SSCA meetings and are not likely to be members of the individual student's current IEP team. At meetings when the SSCA Analysis Team will determine whether the student was delayed or denied placement in a therapeutic day school, a District Representative will also participate in the meeting per CPS policy. An ODLSS District Representative and/or ISBE Monitor may also attend any SSCA meeting to observe.

The SSCA Analysis Team will gather qualitative and quantitative data from the 2016-17 and/or 2017-18 school year(s) and any other relevant school years to enable the team to determine whether a delay/denial in supports or services occurred and whether the student made expected progress in light of their unique circumstances. See **Fig. 3**, containing additional information regarding the obstacles in the system or processes that may have caused a delay/denial in services during the relevant school years.

Fig. 3

Procedural changes that may have caused delays or denials of services, eligibility, or placement:

Area	Procedures
Transportation	If the school was a magnet, magnet cluster, selective enrollment, charter, contract, or options school, the ODLSS District Representative needed to be part of the IEP team discussion. If the school was the student's neighborhood school, the ODLSS District representative needed to be part of the IEP team discussion if the reason for transportation was because the student was a threat to self or others or was unable to navigate travel to school safely. The ODLSS District Representative had to either be physically present at the IEP meeting or delegate their role to the school through completion of the <i>ODLSS DR Review Form</i> .
Extended School Year	The ESY section of the IEP did not open for the regression/recoupment discussion until after January 17th during the 2016-17 school year or after November 15th during the 2017-18 school year and closed May 10 th . The <i>ESY Data Collection - Fall Regression/Recoupment</i> form, which required ten weeks of data, also had to be finalized in order for the section to open. If the school was considering ESY for critical skills, the ESY section of the IEP did not open until after spring break. The <i>ESY Data Collection - Critical Skills/Special Circumstances</i> form had to be finalized; ODLSS District Representative authorization was required for eligibility under special circumstances; Principal sign off was required for critical skills.
Paraprofessional	The <i>Paraprofessional Justification Form</i> , which required five unique days of data in the relevant academic or behavior support areas across settings and Principal sign-off, had to be finalized in order for the paraprofessional question in Section 10-A to open.
Specific Learning Disability	Prior to determining a student eligible with an SLD, the IEP team needed to gather at least ten weeks (two five-week interventions that were not concurrent) of data regarding tiered supports and interventions (i.e., MTSS) and enter the data into the <i>Learning Environment Intervention (LEI)</i> form.
Therapeutic Day School	Prior to consideration of placement in a therapeutic school, the team was required to implement function-based interventions and monitor progress with data collection for a minimum of five weeks. The school team was supposed to review progress monitoring data and make any necessary changes/additions to the interventions, which had to be implemented for at least five additional weeks. ODLSS District Representative authorization was required for placement in a therapeutic school.
Budget	CPS's special education position funding and budget appeals processes during the 2016-17 and 2017-18 school years may have caused the paraprofessional support or specialized instruction required by the student's IEP to be delayed or denied while the school requested additional funds for a special education position needed to implement the service or because such a request was denied.

NOTE: The student's current school staff are expected to cooperate with the SSCA Analysis Team and respond to all inquiries in a timely manner. The parent/guardian is encouraged to bring any relevant documents to the SSCA meeting that will assist in the SSCA decision. Such information could include communication between the parent and school, documentation of private services or evaluations provided, or other information the parent/guardian believes would be helpful to the team.

Qualitative and quantitative data that may be relevant to whether the student made expected progress:

Primary	Secondary	
<ul style="list-style-type: none"> ▪ IEP goals, benchmarks, and progress reports ▪ Report cards/transcripts ▪ Benchmark assessments (NWEA/MAP, DIBELS/TRC MClass) ▪ PSAT/SAT ▪ Progress monitoring data (EasyCBM, AIMSWeb, F&P) ▪ Norm referenced test scores (KTEA-3, WIAT-3) ▪ Previously attempted interventions 	<ul style="list-style-type: none"> ▪ School attendance ▪ Mobility ▪ Disciplinary records ▪ Behavior logs/BAG reports ▪ Work samples ▪ Interviews ▪ Correspondence between parent and school ▪ Progress notes ▪ Classroom assessments ▪ Classroom observations 	<ul style="list-style-type: none"> ▪ Prior evaluations ▪ Rating Scales ▪ Outside evaluation data ▪ State assessments ▪ Test item/error analysis ▪ Language & cultural considerations ▪ Environmental factors (home stressors, trauma)

Once the 45-day comment period is complete, CPS SSCA teams will begin to schedule UER phone conference calls and SSCA meetings. There have been a few setbacks with the CPS SSCA team's ability to obtain applicants and hire qualified general and special education teachers to staff the SSCA meeting teams. CPS reports it is exploring administrative-based staffing resources to conduct UER phone conferences, and an SSCA Administrative Assistant will be hired to schedule and track meetings. Test or "pilot" UER calls conducted by the CPS SSCA Team for students that may have experienced a delay or denial of transportation services revealed that it generally takes at least an hour to conduct one UER phone call. Concerns expressed by several stakeholder groups and shared by the Monitors are that the SSCA IEP meetings and the UER phone conferences may not be completed by September 30, 2021, which is the deadline to file a state complaint for issues related to the Public Inquiry. ISBE has requested consideration of legislation that would extend the deadline for parents/guardians/students to file a state complaint for an issue related to the Public Inquiry.

The Monitors will continue to focus on training various stakeholder on the SSCA and UER process, procedures and guidelines. The training deck for parents on SSCA meetings has been developed, and once the training is recorded it will be published on the ISBE Monitor and ODLSS websites. The Monitors are also in the process of developing a specialized training for educational surrogates whose students have already been identified as qualifying for a UER. This training is tentatively scheduled for the end of October 2020.

SSCA by the Numbers

Students identified as having IEPs 2016-17	54,296
Students identified as having IEPs 2017-18	54,289
Students identified as qualifying for a UER	10,515
Students currently enrolled in CPS identified as qualifying for a UER	6,995
Students identified as eligible for an automatic SSCA Meeting	1,301
Students identified as eligible for an automatic SSCA Meeting based on a possible budget/position appeal delay or denial	180
Total Number of SSCA Meeting requests as of 9/16/20	52
Total Number of SSCA Meeting requests denied as of 9/16/20	8
Total Number of Robocalls regarding SSCA delivered on 2/24/20	125,111

2020-21: Monitoring Goals and Objectives

The overall objective for the monitoring team for the 2020-21 school year is to ensure that the provisions of the corrective action continue to be fulfilled, with primary focus on SSCA implementation. Based upon the monitoring activities of the 2019-20 school year, along with thoughtful input from various stakeholder groups, the Monitors will concentrate their efforts on three additional goals for this school year. The goals are listed below, accompanied by a description of how the Monitors aim to implement each one this year.

Monitoring Schools with Low Child Find Percentages

In collaboration with CPS and stakeholder groups, the Monitors will focus on several schools that have identified less than ten percent of their student population as eligible for IEPs or 504 Plans. The Monitors developed a rubric to utilize with these schools to assist with the investigation of this child find issue. This investigatory rubric contains open-ended questions designed to illicit responses that target specific areas in which child find issues may occur. Examples of questions within the rubric include the following:

- Why do you believe that the percentage of students identified as students with disabilities is so low at your school?
- Describe the MTSS process at your school, including how long a student is anticipated to remain in Tier II or Tier III interventions without making progress? How do you measure progress in the MTSS process?
- What is your school's specific step-by-step methodology for receiving, processing, and tracking evaluation requests and Referral documents?
- If a teacher requests an evaluation for a student, do you notify the student's parent/guardian of that request and provide them with a copy of the Referral document?

Once the Monitors receive the completed rubric, they will work closely with ODLSS leadership, the ODLSS District Representative, and likely the CPS Network Chief for the identified schools to determine training opportunities for areas of need that have been identified through the investigation.

Monitoring Schools with a High Number of Sustained Vacancies of Special Education Teachers

The Monitors have identified several schools that have sustained special education teacher position vacancies. In other words, positions that have been allocated to schools, but the schools have been unable to fill the vacancy with a permanently hired teacher. The Monitors will begin to look at three schools that have had vacancies in special education teacher positions for more than six months. The primary concern in working with these schools is confirming that there is a contingency plan to ensure students are receiving the appropriate special education minutes outlined in their IEPs, and to ensure that if students are not receiving the appropriate minutes, that appropriate documentation is being completed and compensatory education meetings are being held.

The Monitors developed an investigatory rubric for this goal as well, and sample questions include:

- How many special education students are impacted by the vacancies at your school?
- Do you have a written contingency plan in place to cover IEP minutes?
- Are any of your vacancies covered by a long-term substitute? If yes, is the long-term substitute a special education teacher?

- What is your specific contingency plan to deliver IEP minutes to students when a substitute cannot be obtained or does not show up?
- Is the process for identifying and recommending students for an evaluation impacted by the number of special education vacancies at your school?
- Do you know what a compensatory education meeting is? If so, do you know what analysis an IEP team must conduct to consider compensatory services?

Budgetary Impact Review

Along with the investigatory rubric described above, the Monitors will work closely with ODLSS regarding the budgetary impact to schools when a school holds a compensatory education meeting. The impact and implications to the school's budget is further explained in **Strand F-Budgeting**. Once the investigatory rubric is completed by the schools, the Monitors will work closely with ODLSS leadership and ODLSS District Representatives to ensure that students at these schools are either receiving the services via their IEPs, or that a compensatory education meeting is conducted to determine if the student was negatively impacted and did not make progress due to a failure to provide IEP supports and services. Tracking these compensatory education meetings to determine the impact of these budgeting practices on the school-based IEP teams will be part of investigation.

An Equity Mindset in the Monitoring Duties

The third monitoring goal for this year was identified in collaboration with various stakeholders, including ISBE colleagues. We refer to it as equity-mindedness in the monitoring function, by creating opportunities for equal access in historically underrepresented populations. As a starting point, the Monitors have reached out to ISBE colleagues whose work focuses on these populations to broaden our outreach within these underserved communities. The Monitors have conducted initial meeting with ISBE colleagues in the multilingual department, the department that oversees the Illinois' homeless student population, and the department whose work assists students who are linked to the Department of Children and Family Services. In collaboration with these departments and their community contacts, we hope to find ways to attend IEP meetings and monitor students with disabilities who also fall within one or more these underserved and at-risk populations. The Monitors will track the number of IEP meetings they attend for these students, and it is fully expected that this information will be shared within next year's Annual Report.