

EXECUTIVE SUMMARY

The Illinois State Board of Education 2021 Annual Monitoring Report highlights the progress and results of the Chicago Public Schools (CPS) Corrective Action Plan (CAP), which was created in response to the Public Inquiry conducted by the Illinois State Board of Education (ISBE) during the 2017-18 school year. Both 2019 and 2020 Annual Reports provided background information and updates on engagement activities and the specific components of the Corrective Action Plan, which includes nine categories or "Strands." For the 2021 Report, the CAP and Strands are broken down into a more visual, project oriented format that indicates the status of the categories within each Strand. As was the case for the 2019-20 school year, the 2020-21 CPS school year featured continued impacts of COVID-19, with little in-person instruction. The Monitoring work again focused on persistent challenges to Student Specific Corrective Action (SSCA - Strand I), which led to increased feedback from stakeholders and another marked shift in the process to provided individualized remedies to students who were, or may have been, negatively impacted by improper practices and procedures implemented during the 2016-17 and/or 2017-18 school years.

Similar to the last two school years, CPS and ODLSS underwent changes in leadership and personnel, including departures of the Chief Executive Officer, Chief Education Officer, Chief Operating Officer, Office of Diverse Learner Supports and Strategies (ODLSS) Deputy Chief, and ODLSS Director of Related Service Providers. Additional personnel changes occurred within ODLSS, and the amount of turnaround, most notably within the ODLSS District Representatives group, is concerning. Consequently, fair amounts of time were devoted to rebuild rapport with ODLSS personnel and educate newcomers to the Corrective Action and the Monitoring functions.

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.

2018 Public Inquiry into Special Education Policies at CPS - 2021 Annual Monitoring Report

CORRECTIVE ACTION - 2018-2021

NOTE: Each lettered "Strand" below corresponds to the lettered Strands in the May 16, 2018 Corrective Action Report. They do not appear in the same sequence as within the Corrective Action.

This document does not encompass the broader scope of the Monitoring functioning as articulated on p. 2 of the CAP, first full paragraph: "This recommendation does not exhaust the technical assistance ISBE may provide to CPS in order to implement the corrective action necessary to change the culture in Special Education at CPS. ISBE may provide additional training, programmatic support, grants or other technical assistance to ensure that CPS makes necessary reforms and to ensure students, parents and families have the resources they need to guarantee they receive appropriate services and supports."

STRAND F: Budgeting

<i>Corrective Actions</i>	<i>Responsible Person(s)</i>	<i>Current Status</i>	<i>Additional Work Necessary</i>	<i>Nature of Work Ahead</i>	<i>Activities to Date / Additional Details</i>
F Review CPS budget plan for FY 19	ISBE	Complete	No		CPS publicized its 2018-19 SY budget in early August 2018; the Monitor and ISBE General Counsel met with ODLSS' Budget Team to review their budget and corrective changes, which were approved. During the 2019-20 SY , ODLSS revised its position allocation formula, which was approved after much discussion and review (see the 2020 Monitoring Annual Report for details on meeting dates and revised formulas). There have been no revisions to the budgeting process and formulas since that time.
F Review CPS staffing/allocation formula	ISBE	Complete	No	Only if ODLSS proposes to revise its budget formula/processes.	Due to teacher shortages, in the majority of circumstances, the most significant challenge regarding SpEd positions is filling existing positions and securing qualified substitutes to cover vacancies and absences. This is why training (as explained below in F.2) remains critical.
F.1 Provide 2018-19 staffing/allocation formula to ISBE	CPS	Complete	No		When and if the position analysis and processes change in any way for position requests or position appeals, ODLSS must inform the Monitor prior to the application of such changes. This will also require a 45-day public comment period as per P.A. 101-0515.

COLOR CODES

Completed

A Strand or aspect of the Strand that should continue every SY and/or should be reviewed/monitored by ISBE.

Ongoing Work

F.2	Establish an appeals process that includes: Documentation required from schools and timelines of expected response from ODLSS	CPS	Complete	N/A	Only if ODLSS proposes to revise its budget formula/processes.	The ODLSS Budget Director and Manager utilize a team of ODLSS educator-based administrators to assist with position requests and appeals. The Monitor meets with this team weekly to review position requests/appeals, as well as to identify and discuss training needs regarding scheduling, IEP writing, and LRE decisions that are impacting appropriate use of special education staff and thus leading to requests/appeals that may be unnecessary. The Monitor directs and/or assists with professional development for specific schools who need extra guidance and training. <u>RELATED</u> : Additional school-based staff training has also been developed and/or scheduled for Compensatory Education meetings and progress monitoring, both of which are linked to matters of staffing, vacancies, and substitutes.
F.3	Review all staffing appeals and override unwarranted denials	Monitor	Ongoing. The Monitor did not override denials in 20-21; all anticipated denials were (and continue to be) discussed thoroughly with the school (with transparency to the Monitor), and support/traning is offered before denials are "final." A school may also submit additional info to request reconsideration post-denial.	Ongoing	The Monitor reviews a real-time tracking document, is notified of any pending denials in order to conduct a follow-up review, and is copied on all correspondence to schools.	Positions are requested or appealed by school Principals, typically with the assistance of Case Managers and ODLSS District Representatives. If schools do not submit sufficient data or documentation, the Principal is alerted and provided with an opportunity to submit additional data and further discuss the request/appeal. The Monitor and ODLSS Budget Team collaboratively review all information. If a denial is warranted and the Monitor does not override it, ODLSS submits an email notice to the school with details on the decision(s), as well as information on additional training and support for scheduling and more robust utilization of existing Staff, when necessary. 4/26/21-5/7/21 Post Budget Appeals (for the 2021-22 SY): SpEdTs Requested: 53; 17 approved, 36 denied. SECAs Requested: 32; 16 approved, 16 denied. NOTE : the number of requests may include multiple positions requested by a single school; in other words, 53 positions requested may only reflect 20 schools submitting position requests.

STRAND C: Electronic IEP System Use

<i>Corrective Actions</i>	<i>Responsible Person(s)</i>	<i>Current Status</i>	<i>Additional Work Necessary</i>	<i>Nature of Work Ahead</i>	<i>Activities to Date / Additional Details</i>
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C	CPS will allow IEP teams full access to the SSM IEP system during the IEP meeting in order to enter decisions and information discussed by the team.	CPS	Complete	No		Previously, there were "locks and blocks" within SSM for certain sections that could not be accessed until a specific date (or by a specific person such as a D.R.) or after a specific type or amount of data had been collected. Many of these were obstacles were removed during and after the Public Inquiry. Meetings with ISBE and the Advocate Representatives were held to confirm changes to the SSM system and Procedural Manual via the Public Inquiry's findings on 5/18/18, 6/1/18, and 6/20/18.
C.1	CPS will use the IEP Notes section to record minutes of the meeting; Notes section is part of the IEP document provided to Parents	CPS	Complete	No		Prior to the 18-19 SY, the SSM system was revised, and the Notes section is now automatically generated and printed in every IEP (regardless of whether there is text therein). Periodically, questions arise regarding what should or should not be in the Notes section. ISBE has advised that staff should understand the fact that the Notes section can provide them with a needed record of key conversations that occur during the IEP meeting that are not captured in other sections of the IEP. Training on this is provided to Case Managers every August prior to the SY at the ODLSS Case Manager Kick-Off.
C.2	CPS will allow IEP teams to make the determination of a Separate Day School ("SDS") placement at the IEP meeting.	CPS	Tracked each SY by Monitor	Oversight	Continue to track SDS numbers year-to-year.	ODLSS District Representatives must still attend IEP meetings where SDS is considered - ISBE is in agreement with this. A report was created to determine whether a notable amount of meetings have been delayed due to the lack of District Representatives' ability to attend meetings - fortunately, delays due to meeting attendance are not prevalent, but referrals and school assignments have been slow since ODLSS lost and has not replaced their nonpublic manager. There has been a notable uptick in SDS referrals to-date: Aug: 2, Sept: 31; Oct: 29, Nov 1-4: 3; TOTAL 65 ISBE continues to recommend that ODLSS hire a replacement Non-public Manager as soon as feasible.
C.3	CPS will allow IEP teams to determine Paraprofessional support, ESY eligibility, and transportation eligibility at the IEP meeting.	CPS	Corrected in SSM and tracked each SY by Monitor	Oversight	CPS must ensure IEP teams have autonomy to make decisions re: ESY, parapro support, and transportation when the student's need for services is fully supported by qualitative and quantitative data.	Professional Development is provided each year to reiterate the importance of data to support IEP decisions, which remains critical.

C.4	CPS will provide training to all staff regarding the changes in the SSM system and the use of the system; procedural guidelines (i.e. Procedural Manual and SSM Help Docs) will ensure consistency.	CPS/ISBE	Complete	Oversight	It is recommended that ODLSS consult with ISBE prior to any changes are made in SSM re: data collection processes and/or documents, new processes for revisions, or any other form of "locks/blocks" in Eligibility documentation or IEP development.	<p>History: All CPS Principals were trained during the Summer 2018 Legal Conference on 7/11, 7/12, 7/13, 7/17, 7/18, 7/19, & 7/20/18. Two citywide trainings per day occurred for all CPS teachers and related service providers on 8/27, 8/28, 8/29, 8/30, and 8/31/18. Trainings were held on the North, South, and West sides of Chicago. Additional training sessions occurred via webinar (which were tracked per sign-in and certificates upon completion) and via additional in-person sessions on 11/2/18. 25,478 CPS staff members were trained, although some webinar sign-ins may have represented group trainings, therefore this number may be an underestimate of individuals who have actually viewed the webinar and materials. All training materials (and the webinar) are posted on the Monitor website and the ODLSS website.</p> <p>NOTE: ODLSS conducted follow-up training sessions for all Case Managers (and thus IEP teams, as Case Managers then train their teams) during September 2018.</p>
C.5	The Monitor will review IEPs periodically to ensure teams have the ability to use the IEP system.	Monitoring Team	Ongoing	Ongoing		The Monitor reviews IEPs weekly depending on the reasons for review. There is an automatic IEP review for any student who is named in a parent or staff report or complaint or for whom the Monitor attends an IEP meeting. The Monitoring Team also reviews a random selection of IEPs within a school if a staff member or parent reports a systemic complaint regarding that school. In order to ensure that IEP teams "have the ability to use the IEP system," the Monitoring Team relies on the SSM Reports to which they have access; they will also review IEP audit logs to ensure that a variety of 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 IEP meeting, as required by law. Lastly, ISBE utilizes information via the IEP reviews to determine what sections/components require additional training or corrective action at the school, Network, and District levels.

STRAND B: IEP MEETINGS

Corrective Actions		Responsible Person(s)	Current Status	Additional Work Necessary	Nature of Work Ahead	Activities to Date / Additional Details
B	ISBE expects that required members of the IEP team are present at every IEP meeting unless the Parents sign an excusal.	CPS/ISBE	This is being monitored by ODLSS	Ongoing oversight by ISBE and ODLSS; training	Continuing to not only stress the importance of required participants by law, but also teaching the rationale behind each participant's unique expertise to benefit the Student.	This component was included in the training sessions referenced in Item C.4 , and it is partially monitored via IEP reviews per Item C.5 (however this method is not the most reliable). Additional training , with a particular focus on GenEd teacher presence and a whole-team approach to Eligibility and IEP decisions, must be further developed via Case Manager Meetings, and school-specific training sessions by ODLSS. CTU members, DRs, school staff, and parent reports should lend to school selection.

B.1	CPS will empower IEP teams to make decisions at meetings; this will be communicated to all SpEd Staff & Parents at the start of the 2018-19 SY; CPS will develop a communication plan that is approved by ISBE	CPS/ISBE	Complete	N/A	N/A	This occurred via changes in the SSM system (see meeting dates re: these changes in Item C above) and was an element of the training sessions referenced in Item C.4. The "communication plan" was embedded in the training, but CPS also provided an SSM Announcement on 8/26/18 to alert all Users of the changes that occurred during the Spring and Summer months.
B.2	CPS will provide a monthly report identifying meetings continued and a reason for the continuance. If a meeting is continued for D.R. or Principal approval, CPS will report the reasons why approvals were required.	CPS/Monitor access	Ongoing	Ongoing oversight by ISBE, but ODLSS must independently run and track these reports for oversight.	This was remedied prior to the start of the SY in that Principals/DRs no longer approve specialized services in IEPs, with the exception that DR's oversee SDS placements as noted above in Item C.2, which ISBE approved.	The Monitor has direct access to the reports that capture this information, but ODLSS/DRs should check it monthly to ensure that delays are not occurring and to address correlating issues if there are delays that occur. NOTE: Only two types of meetings require ODLSS District Representative (DR) attendance: those to consider and recommend placement in a SDS, and adding transportation as a related service in Charter/Contract/Options schools.
B.3	The Monitor or other ISBE Staff will attend IEP meetings throughout the 3-year implementation of the CAP. The Monitor may provide feedback to the IEP team and D.R. following the meeting.	Monitoring Team	Ongoing	Ongoing IEP attendance		A Monitoring Team member attends ED/IEP meetings upon request by Parent/Guardian/Student, CPS staff, or ISBE colleague - in all circumstances as a neutral third party to ensure discussions and decisions are equitable and adhere to best practices and state/federal law. This is explained to all at the beginning of the meeting. The process is overseen in the best interest of the student, first and foremost.
B.4	CPS will enable ISBE to provide training regarding drafting legally compliant IEPs	CPS/ISBE	Initial training completed in 2018, but ongoing training is needed in this area due to the size of the District and regular staff turnover.	Oversight	Oversight	An overview of IEP writing was covered at the beginning of the SY for Staff and Parents (see Items C.4 and G.6); it should be noted that CPS coordinated all locations, registration, and tracking staff who was trained before and throughout the SY. The Monitor also provides these trainings at individual schools or directs that staff attend ODLSS PD's on IEP writing (which are comprehensive and Monitor-approved). Additionally, during the Summer 2018, ODLSS offered IEP Development Trainings (3hrs each) across all District Networks on 6/25, 7/11, 7/12, 7/17 & 7/18, 7/19, 7/20, 7/23, 7/25, 7/31, 8/8, 8/20, & 8/30/18.

B.5	CPS will enable ISBE to provide District Rep's and other select staff with training regarding facilitated IEPs	CPS/ISBE	Initial training completed in 2018, but ongoing training is needed due to critical ODLSS staff turnover.	Training should occur again given staff turnover - whether by Key2Ed or ODLSS.	ISBE recommends this occur at least once per year; consider ODLSS staff and Case Manager turnover rates.	The initial training occurred in collaboration with Key2Ed (Co. who trained our ISBE Facilitators) on 10/18/18. ODLSS Leadership and Parent Involvement Specialists were also present. There are only a small handful of attendees, including ODLSS leadership, who were present for this training and remain in ODLSS to-date.
B.6	CPS will use ISBE IEP meeting facilitators throughout the school year at sites identified by the CPS Monitor	CPS/Monitor	Ongoing	Ongoing	ISBE recommends ODLSS encourage ISBE facilitation via Principal-based communication and in monthly CM meetings.	2020-21 SY: ISBE facilitated 11 IEP meetings in CPS. While the Monitor has recommended facilitation for various meetings/cases, facilitation was not mandated.

STRAND A: ISBE APPOINTED MONITOR

Activity		Responsible Person(s)	Current Status	Additional Work Necessary	Nature of Work Ahead	Activities to Date / Additional Details
A	Appointment of the Monitor	ISBE General Counsel	In place			Currently, there is a Monitor housed in the Legal Department and a Principal Consultant in the Special Education Department, who provides assistance with the Corrective Action work.
A.1	CPS will fully cooperate with the Monitor including timely notice of meetings, requested data, and other info related to the CAP's implementation	CPS/Monitor	Ongoing	Ongoing	Continued cooperation and collaboration.	This requirement and specific expectations were reiterated prior to the start of the 2021-22 SY due to a notable amount of staff turnover in ODLSS in the 2020-21 SY.
A.2	The Monitor will have access to the SSM system to independently monitor IEPs throughout the school year.	CPS/Monitor	Access provided and current	Ongoing access	Continued access to SSM	The Monitor has Administrator access to the SSM system (albeit not full access), including access to all IEPs/evaluations/related documents and to SSM-based District Reports. This is critical to investigate reports/complaints, as well as to carry out most Strands of the Corrective Action.

A.3	CPS will seek approval from the Monitor prior to changing or adopting policies and procedures re: SpEd, including changes to the Procedural Manual	CPS	Ongoing (whenever edits are made to the Procedural Manual).	Ongoing review when revisions are pending.	Review all pending revisions to SpEd policies, procedures, guidance, and related communication.	Changes to the PM are reviewed in the Summer prior to the next SY so that the PM is ready for publication at the BOY or as soon as feasible. For the 21-22 school year, ODLSS notified the Monitor of revisions to the PM on 6/11/21, and ISBE provided feedback, edits, and recommendations on 6/18/21. Many recommendations were left unaddressed by CPS, and CPS posted the document for public comment (per statute) 6/25 - 8/17/21. The Monitor met with ODLSS and CPS Law on 9/1/21 to discuss ISBE's pending recommendations/edits and the Public Comments. ISBE provided final edits to CPS by 9/8/21, and the Manual was submitted to ODLSS Senior Leadership and Communications. As of 11/2/21, the updated manual has not been published; the Monitor made inquiries on 10/6 and 10/13 as to projected timing, and it was relayed that CPS Communications has not yet completed their review. UPDATE: The 2021-22 PM was published on or near 12/6/21 .
A.4	CPS will provide the Monitor with dates for all trainings related to SpEd and allow the Monitor or designee to attend and/or participate in the trainings	CPS	Ongoing	Ongoing oversight of trainings.		This requirement and specific expectations were reiterated prior to the start of the 2021-22 SY due to a notable amount of staff turnover in ODLSS in the 2020-21 SY.
A.5	CPS will invite the Monitor to all PAC (Parent Advisory Council) meetings. NOTE: Now called the ODLSS FAB (Family Advisory Board)	CPS	Ongoing	Monthly Meetings		The Monitor attends every monthly FAB meeting - provides updates and fields questions as necessary/appropriate. Notices of the meeting location, agenda, and past meeting notes are also publicly posted on the ODLSS website and/or submitted to Parents via a listserv. The Monitoring Team also attends the debrief meetings the following week with ODLSS Parent Involvement Specialists, ODLSS leadership, and the FAB Officers. The relationship b/w the FAB and ODLSS has been and continues to be tense. This relates to the virtual format of the meeting, communication, and advisory-based issues.
A.6	CPS will invite the Monitor to all meetings with the Advocates when issues of Policy or Procedures are discussed	CPS/ISBE	Ongoing	Recurring meetings	It is critical that ISBE continues to attend/facilitate these meetings.	The nature of these meetings changed in the 18-19 SY. The Advocates preferred to meet with ISBE and invite CPS when necessary. However, ISBE was then serving as the middle-man. The meetings were also turning adversarial. As such, ISBE determined that CPS and the Advocates need to communicate directly and now facilitates monthly Joint Stakeholders Meetings, including/inviting CPS, ISBE, and representatives from the CTU, SEIU Local 73, the CPAA, and the ODLSS Family Advisory Board (officers and other parents). The Monitor also attends monthly Joint SpEd Meetings between CPS and the CTU.

A.7	The Monitor will be accessible to CPS staff for the purpose of raising concerns or filing complaints against CPS. Staff who report concerns to the Monitor shall not suffer retaliation.	ISBE/CPS	Ongoing	Ongoing	The Monitor receives a minimum of 2-5 calls (or other methods of outreach) per day from ODLSS staff, CTU members, Parents, and school-based staff. Much outreach occurs to request clarity or guidance that has not been provided by ODLSS/CPS. Outreach also occurs when staff seeks to problem-solve specific cases or matters in which they are not comfortable or confident bring to their Manager/Director/Chief/CEdO/CEO. This continues to-date.	The ISBE Monitor email (isbemonitor@isbe.net) was set up in July 2018, and an anonymous submission form via website link was set up in September 2018. The ISBE Monitor website went live on 9/19/18. Anybody, including Parents and advocates, can (and do) utilize both the Monitor's email and the anonymous submission form. Many stakeholders also contact the Monitor directly. The Monitoring team will continue to engage and collaborate with ODLSS on these matters when appropriate and at their discretion. The Monitor regularly conducts unilateral consultation with CPS staff and Parents; confidentiality is a priority in many matters and retaliation is often cited as a concern.
A.8	ISBE and the Monitor will have the authority to provide Technical Assistance or additional corrective action if CPS does not fully implement this plan and take other affirmative actions to change the policies, procedures, and practices that are inconsistent with the IDEA.	ISBE	Ongoing	Ongoing	See above.	In June 2021 the Board approved an extension of the Corrective Action for another SY. The Monitoring Team, ISBE Executive Director of Programs, and ISBE SpEd Director had a meeting with ODLSS leaders and CPS attorneys on 7/12/21 to reconnect on common goals and review the extended CAP with specific expectations.
A.9	ISBE and the Monitor will publish reports on the ISBE website on an annual basis which review the status of the CAP, outline activities undertaken in the previous year, and set forth activities for the upcoming year. The reports will be published as long as the Monitor is in place.	Monitor	2019, 2020, 2021 Reports		2022 and shift of Corrective Action to sustainable improvement and oversight.	

STRAND E: Procedural Manual and Guidance

<i>Activity</i>	<i>Responsible Person(s)</i>	<i>Current Status</i>	<i>Additional Work Necessary</i>	<i>Nature of Work Ahead</i>	<i>Activities to Date / Additional Details</i>
E	CPS	2018-19 version Complete	Not for 18-19	See A.3 above	See A.3 above.
E.1	CPS/ISBE	Complete	N/A	Input was received by the CTU, Parents, and Advocates.	Meetings were held: 8/15, 8/16 (2), 8/17 (2), and 8/20/18. This also included input on changes to the SSM system. Follow-up meetings with updates also occurred in Oct

E.2	The ISBE Monitor must review and approve all Procedural Manual changes prior to implementation.	CPS/Monitor	Ongoing	The Monitor will review each SY's updates	See A.3 above	See A.3 above.
E.3	CPS and ISBE will determine how frequently the Manual is updated and updates will coincide with SSM updates. Both should only happen during the SY in response to a legal change that necessitates and update. In the unlikely event this happens, the updated Manual and SSM changes must be broadly disseminated to staff and parents.	CPS/Monitor	Ongoing	Ongoing discussions and determination of changes		

STRAND G: Stakeholder Involvement

Activity		Responsible Person(s)	Current Status	Additional Work Necessary	Nature of Work Ahead	Activities to Date / Additional Details
G	ISBE expects that CPS will engage with various stakeholder groups at regular intervals throughout the SY; meetings will be structured so that CPS provides opportunities for groups to obtain updates and provide feedback for various topics.	Monitor	Ongoing	Ongoing communication necessary	ISBE continues to mandate/attend/facilitate these meetings through the 21-22 SY.	This occurs to some degree (e.g. Parent University, Spring/Fall Expo), but there are still many complaints re: CPS' lack of broad and frequent communication to parents and other external stakeholders, as well as to ODLSS staff, and school-based staff. CPS should seek additional and innovative ways to engage stakeholders, especially Parents, in consultation with ISBE.
G.1	CPS will continue to host monthly ODLSS FAB meetings, in which the ISBE Monitor or other ISBE rep's will attend. CPS will provide ISBE with written agendas, meeting notes, and any relevant documentation before, during, and after the meeting.	CPS/PAC	Ongoing	Monthly Meetings	See A.5 above.	The FAB facilitates these meetings and creates the agendas and meeting notes/materials with the assistance of ODLSS. The FAB and ODLSS have been at odds regarding the virtual meeting format, as the FAB feels that ODLSS controls or attempts to control the accessibility of the meetings (webinar style, Chat features, translation, etc.)
G.2	CPS will meet with the ISBE monitor on a weekly basis	ODLSS/Monitor	Ongoing	Weekly Meetings		The Monitor meets with ODLSS/CPS every Monday afternoon and sometimes more frequently. Monitor attends weekly ODLSS District Rep and SpEd Administrator meetings. In 2021, while awaiting a new ISBE General Counsel, ISBE's SpEd Director and Executive Director of Programs also attended these meetings. The meetings are primarily facilitated by the CPS Law Dept, with attendees from ODLSS.
G.3	CPS will meet with rep's from Advocate groups on a monthly basis to provide relevant updates regarding CPS's SpEd system. The ISBE Monitor will be in attendance.	CPS/ISBE/Advocates	Ongoing	The Monitor has advised that this occur at least quarterly.		
G.4	CPS will involve stakeholders in the review of the ODLSS Procedural Manual prior to the start of the 18-19 SY.	CPS	Complete			See E.1. This is also an ongoing conversation regarding future updates and edits.

G.5	ISBE will provide CPS with specific notices to parents that CPS must share the ISBE Parent's Guide, Procedural Safeguards, and a list of low-cost and free legal services available in the area. ISBE will provide these documents in English and Spanish and other languages upon request.	ISBE/CPS	Complete			ISBE provided a Nov 2018 Letter and list of low-cost legal services to Parents via school-based hand delivery, the ISBE website, and the ODLSS website. The letter was ready earlier, but the Advocates did not agree with the wording and message of the letter. After several edits based on their feedback, ISBE posted and released the Letter in November, and CPS assisted with the dissemination via Report Card pick-up days, email, and SSM announcements directing Case Managers to provide the Letter to Parents/Guardians.
G.6	ISBE will provide training to parents on their rights within the first semester of the 2018-19 SY. A training will take place in each network; CPS will assist ISBE by providing space for these trainings and by broadly advertising the trainings once scheduled.	ISBE/CPS	Complete for 18-19	Parent University sessions have continued every SY	Parent Universities have continued, and should continue, since the 18-19 SY. Currently, they are virtually accessed. There are usually 6 sessions per month, each month features a different topic.	

STRAND D: Data Collection

Activity	Responsible Person(s)	Current Status	Additional Work Necessary	Nature of Work Ahead	Activities to Date / Additional Details
D	CPS	Ongoing	Ongoing and with additional training	Additional Training must continue and be further developed - Case Manager Meetings and SEA trainings cover some aspects of data collection, IEP services, and progress monitoring, but this should continue and increase District-wide.	ODLSS emphasizes data-driven decisions, but teams need much more training on this. We do not want schools to slingshot into the opposite direction (making decisions based on staff preference/need and not based on individualized student data). Additional training is necessary and has been on ongoing topic of priority with both ISBE and ODLSS during last SY (20-21) and the current SY.
D.1	ISBE/CPS	Initial work conducted, but this should be ongoing and monitored further.	ISBE recommends that CPS continue this training every SY to ensure consistency and integrity amid school-staff turnover		Q&Q data was defined and described in the 18-19 SY teacher training sessions and parent workshops. Training should continue every SY to better equip IEP teams with information and tools re: individualized data collection and analysis to drive and shape instruction and enable students to make meaningful progress.
D.2	CPS	Complete			This was completed while the Public Inquiry was concluding (Spring 2018).

D.3	CPS and ISBE will provide training to staff members regarding best practices in the data driven decision making process. Parent training will also include information regarding data-driven decision making.	ISBE/CPS	Initial work conducted, but this should be ongoing and monitored further.	ISBE recommends that CPS continue this training every SY to ensure consistency and integrity amid school-staff turnover		See Items D.1 and C.4. Additional training is necessary and continues to be an ongoing topic of planning with ISBE and ODLSS.
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STRAND H: Additional Training Plan

Activity	Responsible Person(s)	Current Status	Additional Work Necessary	Nature of Work Ahead	Activities to Date / Additional Details
H ISBE expects CPS to initiate a robust and transformative plan for training staff regarding Federal and State special education laws. The Plan will outline the training CPS will provide to staff regarding special education over the next three years.	CPS	Ongoing for 21-22 SY	Oversight by ISBE		In the first year of the CA, ISBE and ODLSS agreed to develop training each year, depending on the specific needs of the SY and the climate (e.g. pandemic in 19-20 and 20-21 SYs). District-wide trainings for 21-22 will include Compensatory Education Training, LRE decision making, IEP development, addressing special education staff vacancies, and effective use of staff/scheduling.
H.1 CPS will work with the ISBE Monitor to develop a training plan prior to the beginning of the 2018-19 SY; the Plan shall be for three years.	Monitor/ISBE	Revised in 2018 (see notes)	Develop and adjust each SY		In the first year of the CA, ISBE and ODLSS agreed to develop training each year, depending on the specific needs of the SY and the climate (e.g. pandemic in 19-20 and 20-21 SYs). The Monitor will collaborate with the ISBE CPS SpEd Accountability Team on training that aligns with Indicators and the SPP.
H.2 The Monitor shall be invited to participate in every training under the plan	CPS	Ongoing	Ongoing		This was reiterated prior to the start of the 21-22 SY.
H.3 The Monitor shall approve any changes to the Plan throughout the three year implementation period.	CPS/Monitor	Ongoing	Ongoing		

STRAND I: Student Specific Corrective Action (SSCA)

Activity	Responsible Person(s)	Current Status	Additional Work Necessary	Nature of Work Ahead	Activities to Date / Additional Details
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I	The Public Inquiry Team found several instances where CPS practices may have delayed or denied services to individual students. It is ISBE's expectation that the students whose services were delayed or denied as a result of the practices that were inconsistent with IDEA Part B must be identified, and opportunities to remedy the delay or denial must be offered when appropriate.	ISBE/CPS (in partnership and communication with the CTU, CPAA, and Advocate rep's.	Commenced and continues	CPS is expected to finalize its contract with a Claims Administrator to commence the process for families to obtain monetary-based remedies.	Review and approve: CPS' claims administration process, updated communications to families, marketing plan, deadlines, and tracking process.	SSCA numbers (i.e. numbers of families that were being found eligible for remedies) were dismal in the 20-21 SY, and ISBE/external stakeholders consistently identified and outlined flaws in ODLSS' SSCA process. As such, stakeholders, with ISBE's endorsement, proposed a shift from SSCA meetings (that determined eligibility for an SSCA remedy) to automatic remedies to all who were slated to have SSCA meetings. Shortly before the start of the 21-22 SY, CPS agreed to this proposal and also proposed to shift remedies from a services-based model (e.g. tutoring, therapies etc.) to a flat-rate monetary-based remedy model. Public Comments closed on these proposed revisions in late September.
I.1	ISBE and CPS will work to devise a plan to ID students whose services were delayed or denied. Subject to the approval of the U.S. DOE's Office of Special Education Programs (OSEP) the plan will include at least the following:	ISBE/CPS	Complete	These families must be successfully informed of the shift to monetary remedies, as they may submit a claim for additional money if there is a balance or submit a claim if they were originally denied a remedy via an SSCA meeting		Families who received a remedy less than the flat-rate amount for the respective area (e.g. parapro, ESY, transportation) may submit a claim for the "balance;" families who were had an automatic SSCA meeting and were denied a remedy may also submit a claim for the respective area for which they were identified.
I.1.a.	A process for IEP teams to follow to examine the delay/denial of services and determine remedial opportunities;	CPS	The process has been modified and now only applies to ODLSS SSCA teams who are holding parent-requested SSCA Meetings.	ODLSS SSCA Teams must still hold parent-requested SSCA meetings with ISBE oversight.		
I.1.b.	A process that will allow ISBE to choose a sampling of IEPs from the schools it ID'd as most affected by CPS's policies and procedures and initiating a review of the delay/denial of services and remedial opportunities;	Monitor Team	No longer applies			This analysis may still occur, but ISBE maintains that forward-looking training must occur at the school level, as well as ongoing oversight of ODLSS to ensure new procedures and policies are not perpetuating delays/denials in the same or other areas of special education.

I.1.c.	An expedited State Complaint procedure through ISBE for individual parents and families.	ISBE	SCs can be filed until 9/30/22			ISBE has agreed to expedite SSCA Complaints when Parents choose to bypass the IEP Team process for consideration of SSCA. An ISBE Principal Consultant will also be dedicated to these specific complaints.
I.2	The ISBE Monitor will have full oversight of the SSCA including the right to overturn the IEP team decisions granting or denying remedial opportunities.	Monitor Team	Ongoing with SSCA Meetings	Ongoing until end of SSCA		
I.3	CPS will assist ISBE in notifying all parents and families of the SSCA process in order to ensure that all parents and families, including those who do not currently receive special education and related services, have the opportunity to pursue corrective action if eligible.	CPS	Ongoing with Claims Process	Communication to Families / Marketing		