

Defining Policy, Procedure, and Practice

Introduction to Policy, Procedure, and Practice

Following the determination of significant disproportionality, the *Individuals with Disabilities Education Act* (IDEA) requires that states must provide for the review, and if appropriate, revision of policies, procedures, and practices (PPPs) in the area in which a local education agency (LEA) is significantly disproportionate (i.e., identification, placement, or disciplinary removals). Additionally, IDEA requires that the LEA set aside 15 percent of its Part B funds to provide comprehensive coordinated early intervening services (CCEIS). The purpose of this PPP review is to ensure **compliance** with the requirements of IDEA and to identify **contributing factors** of the identified significant disproportionality.

In this *In Brief*, the Data Center for Addressing Significant Disproportionality (DCASD) will clarify the terms policy, procedure, and practice in order to provide states and LEAs with a shared understanding of these terms. Further, because the PPP review is an important source of qualitative data used to identify factors contributing to significant disproportionality, this resource serves to ground state staff through contextualizing policies, procedures, and practices in regulation and providing examples. Please note regulations do not specify how to conduct PPP reviews or what must be included in one, which means states have flexibility in those decisions. Additionally, while these examples illustrate what policies, procedures, and practices may include, this is not an exhaustive list of all associated IDEA regulations or LEA policies, procedures, or practices that may need review.

Section 1: Policy

Policy refers to overarching principles, rules, or guidelines established by federal, state, local, or other governing bodies to ensure compliance with the requirements of a law. Policies outline broad objectives and standards that may include legal mandates; school board rules and policies; eligibility criteria; and the rights and responsibilities of students, parents, and educational personnel relevant to special education.

Table 1 provides examples of policies, and in this case regulations, as they apply to each area of significant disproportionality. These examples highlight what policies might be included in a PPP review, but states should consider additional IDEA regulations and associated policies that need review for each area of significant disproportionality.

Table 1. Examples of policies related to each area of significant disproportionality

Area of significant disproportionality	Policy example
Identification	LEA policy for Child Find that is consistent with 34 C.F.R. § 300.111
Placement	LEA policy that is consistent with placement as defined in 34 C.F.R. § 300.116
Discipline	LEA policy that is consistent with authority of school personnel as defined in 34 C.F.R. § 300.530

Section 2: Procedure

Procedures are detailed steps or processes that operationalize established policies. They provide specific instructions on **how to implement** policy requirements in various situations. Procedures may delineate the sequence of actions, roles and responsibilities, timelines, required documentation, and other operational aspects related to special education. They also help ensure compliance, consistency, and efficiency in the implementation of policies. Examples of procedures could include written procedures, manuals, tools, procedural safeguards, and others.¹

Table 2 provides examples of procedures as they apply to each area of significant disproportionality. These examples highlight what procedures might be included in a PPP review, but states should consider additional IDEA regulations and associated procedures that need review for each area of significant disproportionality.

Table 2. Examples of procedures related to each area of significant disproportionality

Area of significant disproportionality	Procedure example
Identification	Procedures demonstrating how the LEA identifies, locates, and evaluates children in need of services such as procedures for engaging parents of over-identified subpopulations of students through Child Find services, consistent with 34 C.F.R. § 300.111.
Placement	Procedures for individualized education program (IEP) decisionmaking used for determining placement options, consistent with 34 C.F.R. § 300.116.
Discipline	Procedures for disciplining students with disabilities (e.g., a discipline handbook), consistent with 34 C.F.R. § 300.530.

Section 3: Practice

Practice refers to the **actual implementation, application, or execution** of policies and procedures in educational settings. Practices encompass the day-to-day activities, interactions, interventions, and strategies employed by educators, related service providers, administrators, and other interested parties² to meet the individualized needs of students with disabilities. Examples of practices include completing evaluations for special education, collecting child-specific examples of IEPs, implementing documentation of interventions, and measuring evidence(s) of implementation. They can also include data from student record reviews, surveys, or service logs.

Table 3 provides examples of practices as they apply to each area of significant disproportionality. These examples highlight what practices might be included in a PPP review, but states should consider additional IDEA regulations and associated practices that need review for each area of significant disproportionality.

Table 3. Examples of practices related to each area of significant disproportionality

Area of significant disproportionality	Practice example
Identification	Evaluation review of students in the over-identified subpopulation
Placement	Review of IEPs and prior written notices of placement for students in the disproportionately placed subpopulation who are placed in a regular education setting for less than 40% of the day or in a residential facility or separate school
Discipline	Review of disciplinary actions, manifestation determination meetings, and resulting placement decisions for students in the disproportionately disciplined subpopulation within the year(s) represented in the determination

Summary

If an LEA is identified with significant disproportionality, IDEA requires states to provide for the review of PPPs in the area(s) that the LEA is significantly disproportionate. DCASD developed this document to serve as a foundation for understanding the basics of PPPs in relation to significant disproportionality. However, the purpose of a PPP review is to ensure **compliance** with the requirements of IDEA and to identify **contributing factors** of the identified significant disproportionality. Therefore, in addition to providing the definitions and examples outlined here, the state should identify PPP examples and non-examples within their guidance materials or review instructions. Ultimately, the goal of a PPP review should be more than to simply complete a task; rather, the goal should be to engage in a process of continuous improvement that reflects on an LEA's related policies, procedures, and practices to ensure appropriate decisions for all students.

Identifying policies, procedures, and practices can be complex, so to assist in this process, DCASD has developed a PPP review checklist states can use to complete a review of their PPP-related resources. In addition, if your state needs support developing guidance materials or further assistance in the PPP review process, please contact [your state's DCASD technical assistance specialist](#).

For More Information

Need help understanding the basics of significant disproportionality, including what it is and what we mean by the three areas of disproportionality? Check out DCASD's In Brief: *Introduction to Significant Disproportionality*.

Endnotes

¹IDEAs That Work Resources. (2024, March 29) OSEP 2024 March national TA call on DMS [Video]. YouTube. <https://youtu.be/nj3ly44j4f-c?si=0YiCJwUIJGZjhMEO>.

²While OSEP uses the term stakeholder in regulation, we are replacing the term with interested parties.

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