



Los Angeles Unified School District

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June 20, 2016

Dr. David Rostetter, Independent Monitor
Office of the Independent Monitor
Modified Consent Decree
333 South Beaudry Avenue, 18th Floor
Los Angeles, California 90017

Re: **OIM Annual Report Part II - Request for Information**

Dear Dr. Rostetter:

The District appreciates the request for information regarding the District's progress in the implementation of the Modified Consent Decree. Please see the information below and attached for highlights of the District's efforts.

Two-Year Plan for the Achievement of MCD Outcome 13

The District's Plan to Achieve MCD Outcome 13 has focused on clearly articulated policies and procedures, an effective service tracking system, and an effective and user-friendly system of monitoring service delivery. Of the thirty-five actions in the Plan, five actions remain to be completed. Each of these involves technology development to enhance service tracking and self-monitoring. The five remaining actions are as follows:

- B-1-4: Implement a procedure for substitutes to document services in the Welligent service tracking system. Status: This Welligent development project will be ready for substitutes for Resource Specialist teachers to document services provided in the Fall 2016 semester of the 2016-2017 school year.
- B-1-5: Implement a link between the Welligent IEP FAPE Part 2 section and the service record to automatically create the service record. Status: This Welligent development project will be ready for piloting in the Fall 2016 semester.
- C-1-2: Develop and implement links from the dashboards to student detail reports on service delivery and documentation. Status: The first phase of this project, IEP data parsing, has been completed. With the parsed data available, the process of creating the dashboards and alerts is being developed. The District will provide you with an updated timeline by the end of June 2016.

- C-1-3: Develop and implement links from the dashboards to student detail reports on service delivery and documentation. Status: This project has been modified.
- C-2-1 Develop and implement an alert system consisting of automatic emails sent to the appropriate central or school site administrator, Resource Specialist Teacher, or designated instructional services provider when services have not been documented at the frequency and duration required per student IEPs. Status: This project has been incorporated into C1-2. The requirements have been determined and this item is pending development by ITD.

IEP Complaint Investigation Corrective Action. As a follow-up to the District's March 22, 2016 letter, Re: IEP Complaint Investigation Corrective Action Feedback, the following additional information is available.

1. The District has established the Division of Special Education's School and Family Support Services (SFSS) Call Center District-wide complaint response system as the identified complaint response mechanism. The District provided the OIM documentation related to the SFSS and look forward to further discussions with the OIM regarding any additional feedback.
2. A draft of Bulletin 5901.4 has been provided to the OIM. The requested list of Bulletins the District reviewed and updated will be provided to the OIM by June 30, 2016.
3. An edit was added to the Welligent Integrated System that requires IEP teams to use the LRE Analysis form to determine the student's least restrictive environment prior to being able to save placement and instructional setting information on the IEP. Phase 1 of this edit prevents the IEP team from saving information in the Placement and Instructional Setting fields on FAPE Part 1 until sections A - B are completed on the LRE Analysis form as appropriate, depending on the individualized need of the student. Phase 2 of this edit will prevent the IEP teams from saving information in the Placement and Instructional Setting fields on FAPE Part 1 until sections A - D are completed, as appropriate, depending on the individualized need of the student. This corrective action was addressed in the draft Bulletin 5901.4.
4. An edit was added to the Welligent Integrated System that appears on the FAPE Part 1 page of the IEP. If the LRE Analysis form has not been completed, the Placement and Instructional Setting sections of the FAPE Part 1 page are grayed out and the following message displays on the FAPE Part 1 page, "Please complete LRE Analysis form before entering any data in the FAPE Part 1 Placement or Instructional Setting". If the IEP team attempts to enter information prior to completing the LRE Analysis form, the following message displays on the FAPE Part 1 page, "The LRE Analysis form must be completed before Placement or Instructional Setting." This corrective action was addressed in the draft Bulletin 5901.4.
5. The IEP Team Meeting Introductory Statements are posted on the Division of Special Education website and are included in the electronic Special Education Policies and Procedure Manual on the website. Schools were sent instructions that accompanied inserts listing the IEP Team Meeting Introductory Statements to distribute to parents with "A Parent's Guide to Special Education Services (Including Procedural Rights and Safeguards)" at IEP team meetings until the District includes the Statements in the

- publication. This publication will include the Statements in the Fall 2016 semester. A new edit in Welligent requires IEP teams to check a box in Section N of the IEP indicating that the IEP Team Meeting Introductory Statements were read aloud at the beginning of the IEP team meeting.
6. The District drafted a Comprehensive List of Programs, Supports and Services following the regulations. The District would like to discuss the additional elements the Independent Monitor has requested be added to the listing to ensure the additional elements align with the intent of the document.
 7. The District provided information responsive to this corrective action on February 19, 2016.
 8. This corrective action was addressed in the draft Bulletin 5901.4.
 9. The District provided information responsive to this corrective action on February 19, 2016. An edit was added to the Welligent Integrated System requiring IEP teams to select the reason for recessing an IEP from a list of dropdown values in the Welligent Management screen and provide a projected reconvene date. IEPs can only be placed in a Recessed Meeting Status if one of the following dropdown values is selected:
 - a. Parent Request
 - b. Parent Exploring Placement Options (Example: Magnet)
 - c. Parent Exploring NPS Placement Options
 - d. Emergency; Details in the Meeting Notes (Example: Lockdown, Collective Bargaining Agreement Limitations)
 10. A new checkbox was added to the Notification to Participate in an IEP Meeting form. In the Purpose of Meeting section of the form, a checkbox for "Change in Placement" was added.
 11. The District provided information responsive to this corrective action on February 19, 2016.
 12. Training will be completed by August 31, 2016.

Substantial Compliance

The District submitted a draft Substantial Compliance Plan to the Independent Monitor on November 1, 2014. The District is working towards full implementation of the Substantial Compliance Framework's five general elements below awaiting feedback from the Office of the Independent Monitor in response to previously submitted documents.

1. Data systems capable of monitoring key compliance and performance indicators at the District and school level. Status:
 - a. Data from the Welligent Integrated System is analyzed to determine the District's performance on a number of indicators, including: time spent in the LRE, transition, timely completion of IEPs, parent participation, service delivery, timely translations, and disproportionate representation – racial and ethnic by special education categories and related services and placement in particular educational settings.
 - b. Data from Office Data and Accountability is analyzed to determine the District's performance on participation and performance in statewide assessments, graduation and

- dropout statistics, disproportionate representation in school discipline including suspensions and expulsions.
- c. The District has collaborated with the Office of the Independent Monitor to learn and accurately replicate the OIM's processes and protocols for monitoring the District's performance for the majority of the MCD Outcomes.
2. Process for monitoring special education compliance and performance at the school level.
 - a. The District monitors service delivery and IEP timelines at the District, Local District, and school levels. Data reports at each of those levels are accessible in the Welligent Integrated System.
 - b. Resource Specialist Program teachers and related services personnel access reports in the Welligent system to monitor their provision of service, including 30 day service reports regarding percent of services delivered and missing services, as well as a year-to-date cumulative report of services delivered towards the targeted minutes.
 - c. The District office sends data twice a month to the Special Education Service Centers (SESCs), the Local District Superintendent, the Local District Directors, the Office of the Superintendent, and school principals regarding below target service delivery data for students receiving Resource Specialist Program services. The SESC's advise and support the Local District offices in addressing service delivery issues with school site personnel.
 - d. School site administrators and teachers access reports in the Welligent system to monitor due dates for evaluations and IEPs.
 - e. The District office sends data to schools, Local District offices, Special Education Service Centers, and other District offices twice a month in regards to upcoming and overdue IEPs and is working with ITD on the development of an IEP timeline calendar in Welligent for implementation by schools and providers in the 2016-17 school year.
 - f. The District developed a list of ten key performance indicators and is finalizing a format for providing monthly status dashboard reports to schools for their use in self-monitoring and addressing indicator performance issues.
 3. Process for receiving and resolving compliance complaints.
 - a. The District's Complaint Management System is managed by the Division of Special Education's School and Family Support Services office and provides callers with the opportunity to make an inquiry, note a concern, or file a complaint. The SFSS office provides a lawful response to all complaints.
 4. Process for resolving IEP disputes.
 - a. The Division of Special Education's Due Process staff work with families who file for mediation or due process hearing. The Division of Special Education assigned a Resolution Coordinator within each Local District. LRE Specialists are notified by a school immediately upon a parent indicating non-agreement with any part of an IEP. The LRE Specialists work with schools, families, and advocates to resolve the disagreement within 5 days. If the LRE Specialists cannot facilitate an agreement, the Resolution Coordinators work with the families and schools to resolve the issues. The Resolution Coordinators are independent of the Division of Special Education and resolve the issues as they deem appropriate and legally compliant. Parents or guardians can utilize formal due process mechanisms at any time if these efforts do not resolve the issues at hand.

The case management documentation the LRE Specialists and Resolution Coordinators develop is captured in the SFSS data system.

5. Management and administrative structure with authority to monitor and enforce compliance.
 - a. The District develops and publishes policies and procedures consistent with state and federal regulations and incorporates these policies and procedures in trainings for administrators and teachers.

Complaint Management System

Please see notes above in Corrective Action number 1 and Substantial Compliance item number 3.

PALS Changing Stations

Please see District's June 20, 2016 letter.

Facilities

Please see District's June 20, 2016 letter.

MiSiS

Please see attached MiSiS Year End Review for 2015-2016 School Year document.

Sincerely,



D. Deneen Evans Cox
Associate General Counsel I

c: Sharyn Howell
Beth Kauffman
Veronica Smith
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