



INDIANA  
DEPARTMENT of  
EDUCATION

# Results Driven Accountability (RDA) Root Cause Analysis

## Indicator 4A & 4B: Suspension & Expulsion

Indiana Department of Education  
Office of Special Education



## Indicator 4: Suspension & Expulsion

### Definition

4a. Percentage of districts with significant discrepancy in suspension/expulsion of greater than 10 days for students with IEPs.

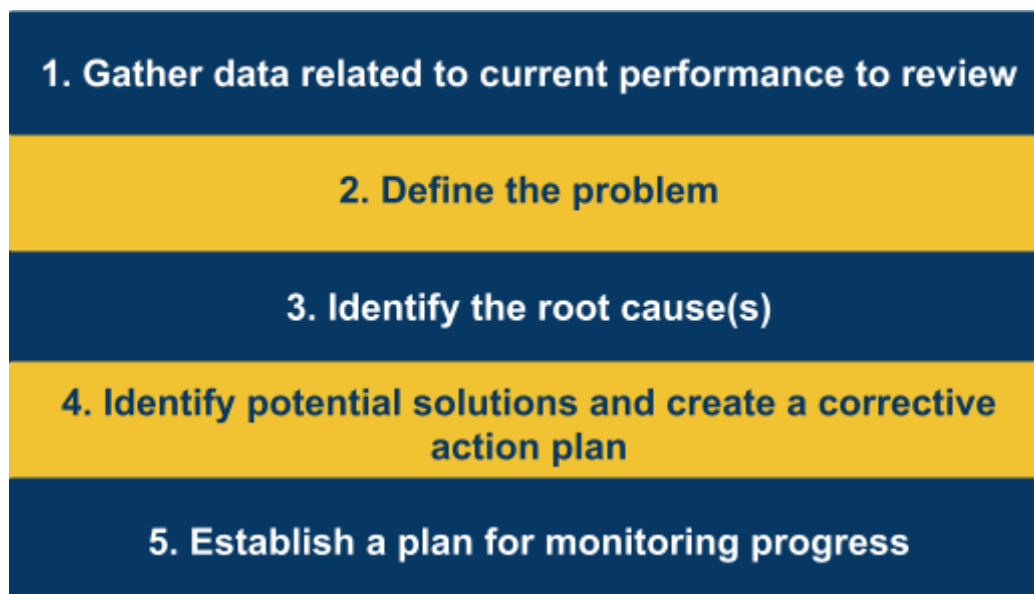
- Identify whether the rate at which students with disabilities are subjected to out-of-school suspension/expulsion (OSS/EXP) totaling more than 10 days is at least twice as high as the LEA's rate at which students without disabilities are suspended/expelled more than 10 days, for three consecutive years.

4b. Percentage of districts with significant discrepancy in suspension/expulsion of greater than 10 days for students with IEPs by race/ethnicity.

- Identify whether the rate at which a particular racial or ethnic group of students with disabilities is subjected to removals totaling more than 10 days is more than twice as high as the LEA's rate at which all racial or ethnic groups of students without disabilities are suspended/expelled more than 10 days, for three consecutive years.

This root cause analysis tool aims to help districts analyze their policies, practices, and procedures related to suspension and expulsion of students with IEPs. Root cause analysis seeks to understand why problems are happening and create a plan that will address those root causes, and remove barriers to student learning.

Root cause analysis and subsequent planning and implementation of corrective action is intended to be performed using a team approach. The steps for in depth root cause analysis, and subsequent corrective action and monitoring, are included below:



## Step 1: Gather Data Related to Current Performance to Review

Data sources to consider:

- Office referrals, suspension paperwork
- Restraint and seclusion data
- Attendance data
- School-based behavior reporting data (frequency of behaviors/classroom)
- Discipline reporting (IDOE-ES)
- Manifestation determination (MD) information
- Behavior intervention plans
- MTSS data
- Student grade reports, transcripts, schedules
- Educational or psychological assessments
- Behavior intervention plans (BIPs) and behavior goals
- Code of student conduct, student handbook, etc.
- Review IDEA Data Center (IDC) Success Gaps [Toolkit](#) and [Rubric: Addressing Equity, Inclusion, and Opportunity](#)

Policy and procedure review:

- Suspension process
- Behavior expectations and LEA discipline policies
- Office referral policy
- Standardized procedures for reporting and recording suspension, and alternatives to suspension
- Monitoring the consistent implementation of practices
- Re-entry process after suspension
- Manifestation Determination procedures
- Positive Behavior Intervention and Supports (PBIS) system
- Process of monitoring and responding to discipline data
  - Procedures for constituting a change of placement including:
    - The timelines for notifying the student's parent
    - Providing procedural safeguards
    - Conducting a manifestation determination
  - Procedures for the case conference committee conducting a manifestation determination meeting
  - Procedures to ensure the student is provided with access to appropriate services during the period of removal

Key questions:

- What does the data reveal about the disproportionate discipline of student populations by race and ethnicity?
- How often is discipline data entered into the student information system (SIS)?

- How frequently do special education and general education leaders review discipline data? How is the data disaggregated (e.g. by student demographics, referral source, suspension reason)?
- Do educators, students, and families have opportunities to share their opinions on discipline practices at this school?
- What processes are in place to foster positive behavior support and interventions for students?
  - What are the alternatives to classroom or school removal?
  - What interventions supporting student well-being are available? Are these interventions evidence-based?
- If a student with a disability is experiencing disciplinary referrals, how is the IEP team informed? What is the next step for the IEP team? When does the IEP team begin to consider if a change of placement has occurred?
- When students are serving in-school suspensions, how are they able to continue to progress appropriately in the general education curriculum and receive special education services specified in their IEP?
- Are there procedures in place for ensuring that students with IEPs have access to required IEP services and are given the opportunity to continue to progress towards their goals during the suspension period?
- If a student's conduct is the direct result of the public agency's failure to implement the IEP, what steps are taken to remedy those deficiencies?
- What professional development and/or resources are available to school personnel who support students with behavioral concerns? What additional support is needed to effectively train staff?
- Does the district have a positive behavioral support system for all students?
- Does the district have evidence that they maintain a supportive environment for students with diverse racial, cultural, ethnic, and linguistically diverse backgrounds?
- Does the district have an established multi-tiered model of intervention services for behavior and academics?
- Are differentiated behavior interventions available to students of racial, cultural, ethnic, and linguistic diversity?
- Are there procedures in place for students to have the opportunity to make up coursework and examinations missed during the suspension period?
- Does the district have a system for tracking patterns related to: office referrals, incidents of detention, in-school suspensions, and out-of-school suspensions due to misbehavior?  
Notable patterns may include:
  - Referral source
  - Time of day, week, year for referrals
  - Proportion of referrals by gender, race/ethnicity, and disability
- Does the district have a system for intervening when there is a concern about the pattern of office referrals, incidents of detention, in-school suspensions, and out-of-school suspensions?
- What data collection systems does the school corporation have in place? Can the data be disaggregated by staff person, location, time of day, student population, etc.?

- What structures are in place to regularly collect and analyze disciplinary data (including office referrals and expulsions) by a multidisciplinary team? How often does that team meet? How often are those individuals selected? What training and administrative support is provided to the team?
- How does the school corporation teach adaptive behaviors and build relationships with students? Do classroom structures support positive student behavior? Do case conference committees consider revisions to the IEP to support teaching adaptive behaviors?
- What positive alternatives to suspension are offered at individual school sites? What training has been provided schoolwide or districtwide related to alternatives to suspension? Are supports available to teachers and school leadership teams to facilitate the growth of programs that provide alternatives to suspension?
- Are services provided during disciplinary removals?
- How are students prepared to re-enter their least restrictive environment (LRE) after a suspension?

## **Step 2: Define the Problem**

After reviewing data, the team will create a 1-2 sentence statement that includes information about the problem. The problem statement should include information about actual impact and potential impact of the problem and should cite specific data. Be as clear and specific as possible.

Example: Students with IEPs are twice as likely to be suspended 10 or more days in a school year than students without IEPs based on a review of the past three years of suspension paperwork.

## **Step 3: Identify the Root Cause(s)**

A root cause is the primary or initiating factor that leads to an outcome, in this case disproportionate levels of suspension and expulsion for students with IEPs. By understanding the root cause(s) of this issue, it will allow districts to focus on addressing the root causes that lead to the problem, not just the symptoms of the problem. Identifying the root cause requires that we dig deep into the issue and focus on why and how a problem is occurring.

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

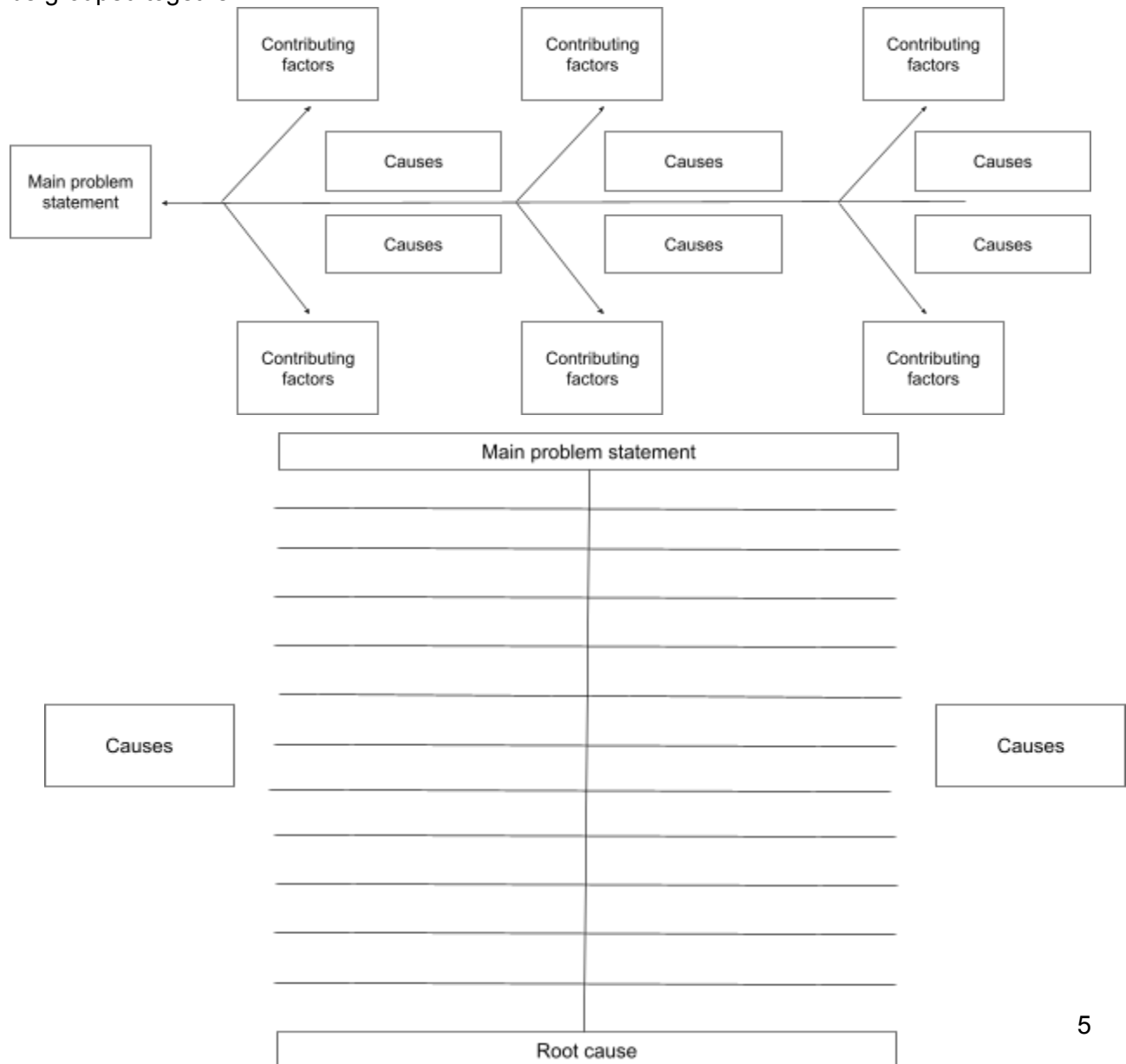
## **Verify the Root Cause - Essential Questions**

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

1. Did multiple data sources support the identification of this root cause?
2. Does the data support that this cause contributed to the problem?
3. Can anything else, besides this cause, lead to the problem?
4. Is this root cause within the school's control?
5. Are there actionable steps we can take to address the root cause?
6. Will correction of the cause lead to the problem no longer occurring?
7. Will elimination of this cause change the outcome?

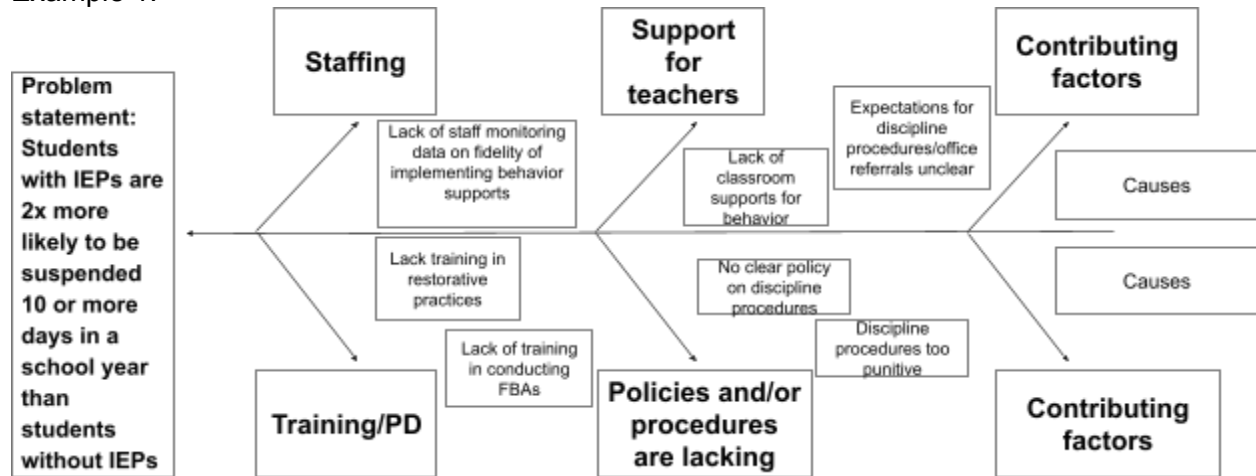
### Fishbone Diagrams

A fishbone diagram is a chart that can help us better understand the contributing factors and causes of a problem. Starting with the problem allows us to break down the factors that contribute to the problem, and consider the causes of each factor. Work as a team to brainstorm causes by asking, "why does this happen," and write ideas with their related category. Continue to ask, "why," and understand deeper levels of causes. Look for patterns or similarities that can be grouped together.

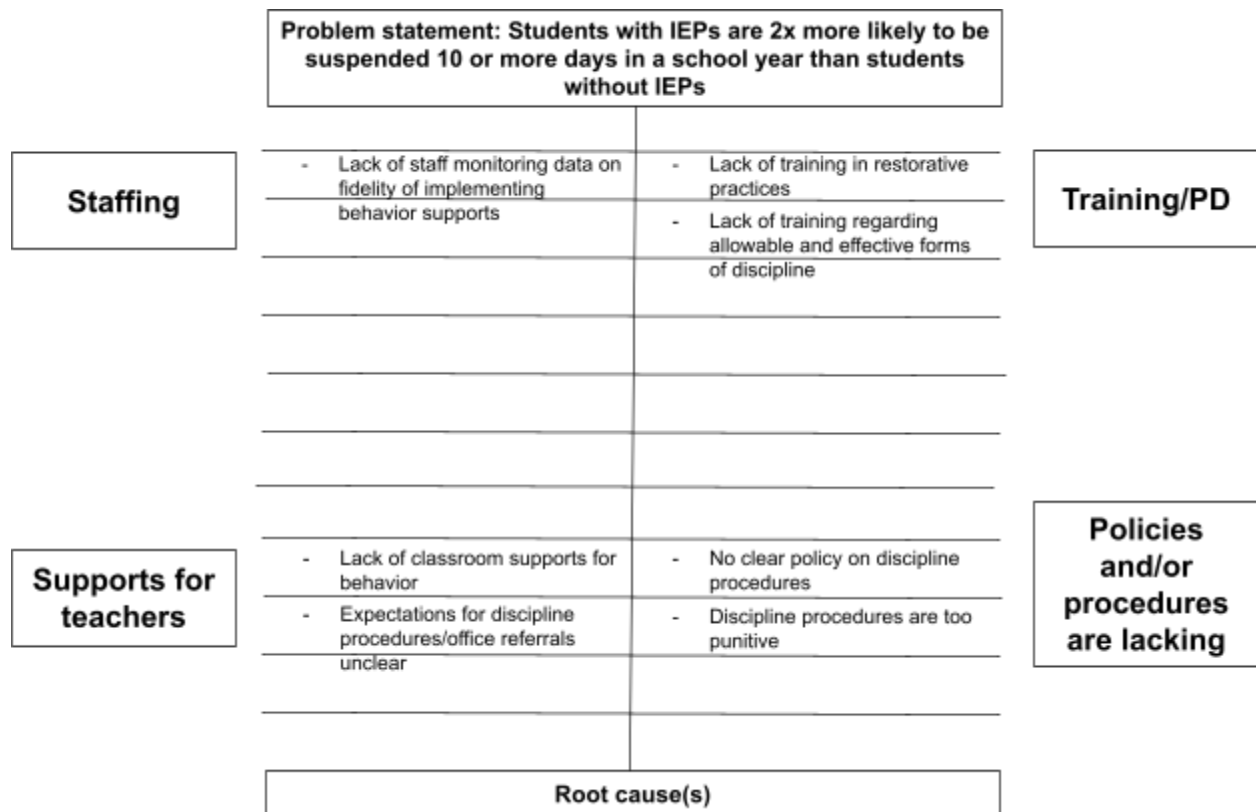


### Fishbone Diagram Examples

Example 1:



Example 2:



## The Five Whys

The goal of root cause analysis is to discover the why. Asking “why” allows us to look beyond the symptoms of the problem and can lead us to the root cause. Continue asking “why” until the team agrees on the root cause. This may take more than five times of asking “why.” Make sure to focus on causes and factors that are within the district’s control and focus on adult actions.

Define the problem:

Why is the problem happening?

Why?

Why?

Why?

Why?

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

Root cause



### The Five Whys Example

Define the problem: Students with IEPs are 2x more likely to be suspended 10 or more days in a school year than students without IEPs

Why is the problem happening?

Students with IEPs are referred to the office more for discipline than general education students

Why?

General education teachers resort to office referrals rather than managing behavior in the classroom

Why?

Teachers are not implementing preventative behavior strategies in the classroom

Why?

There is no clear expectation for teachers in the staff handbook on how to proactively manage behaviors for students with IEPs

Why?

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

The district lacks procedures/training for staff on preventative behavior strategies and restorative behavior practices (e.g. PBIS/MTSS)

Root cause

**Step 4 and 5: Create a Corrective Action Plan and Establish a Plan for Monitoring Progress**

The purpose for completing a corrective action plan is to identify actions that the district will take to correct individual findings of noncompliance as well as ensure there are systems in place for ensuring future compliance. Per Indiana Department of Education guidance, the district must submit verification of correction of noncompliance and evidence of corrective action for future compliance no later than one (1) year from the date of notification of noncompliance.

*Directions:* A blank copy of the corrective action plan for Indicator 4 is located [here](#). Please copy the document and use it for your corrective action plan submission.