EDUCATIONAL EQUITY, COMPLIANCE, & SYSTEMIC REVIEW PROTOCOL

School Disproportionality Self-Assessment Tool

Diagnostic Framework for Identifying and Addressing Disparities in Special Education, Discipline, and Course Access

KLASEY CONSULTING

Regulatory & Diagnostic Scope: Disproportionality occurs when students from a specific racial, ethnic, linguistic, or socioeconomic group are overrepresented or underrepresented in special education identification, restrictive placements, exclusionary discipline, or advanced academic programs compared to their peers **(IDEA, 20 U.S.C. § 1418)**. Rather than attributing disparities to student deficits, this tool audits campus policies, referral pathways, instructional practices, and data systems to uncover systemic root causes **(U.S. Dept. of Education, 2017)**.

School / District Name & Grade Span: _____	**Assessment Date / Reporting Year:** _____
Equity / Special Education / Leadership Lead: _____	**Subgroups Analyzed (Race, EL, Low-SES, Gender):** _____

Part 1: Disproportionality Data Standards & Root-Cause Protocol

1. **Calculate Both Risk Ratio and Composition Index:** Do not rely solely on raw headcounts. Compare the risk of an outcome for a specific student group against all other students (Risk Ratio ≥ 2.0 generally signals significant overrepresentation, while ≤ 0.50 in advanced programs signals underrepresentation) **(U.S. Dept. of Education, 2017)**.
2. **Examine Intersectionality Across Subgroups:** Disaggregate data across overlapping identities such as race/ethnicity combined with English Learner (EL) status, disability category, gender, and free/reduced-price lunch eligibility to prevent disparities from being masked in aggregate averages.
3. **Audit Systemic Practices Before Selecting Interventions:** Pair quantitative risk ratios with qualitative file reviews, classroom observations, and family listening sessions to distinguish policy, bias, or instructional gaps from student need.

Part 2: Diagnostic Inquiry Across Disproportionality Domains

Evaluate each systemic indicator using current campus data and team consensus. Mark **Met** (consistent, equitable school-wide practice), **Dev** (developing / inconsistent implementation), **Gap** (priority equity gap), or **N/A**.

Systemic Disproportionality Standard & Evidence Focus	Met	Dev	Gap	N/A
Domain 1: Pre-Referral MTSS & Special Education Identification				
1.1 Overall & Category-Specific Risk Ratios: Risk ratios for total special education identification and high-incidence subjective categories (Emotional Disturbance, Specific Learning Disability, Other Health Impairment) remain below 2.0 across all racial and ethnic groups. Screens for over-identification in subjective disability categories susceptible to cultural or instructional misinterpretation.	☐	☐	☐	☐

Systemic Disproportionality Standard & Evidence Focus	Met	Dev	Gap	N/A
1.2 Pre-Referral MTSS Fidelity: Prior to a special education referral, documented Tier 1 core instruction and Tier 2/3 evidence-based interventions are delivered with fidelity and verified for cultural and linguistic responsiveness. Ensures referrals reflect true educational disabilities rather than gaps in core curriculum or Tier 1 instructional quality.	☐	☐	☐	☐
1.3 Multilingual & Culturally Responsive Evaluation: Psychoeducational evaluations for English Learners utilize native-language assessments, cross-battery language dominance data, and culturally valid instruments to distinguish language acquisition from disability. Prevents both over-identification and delayed identification of multilingual learners.	☐	☐	☐	☐
Domain 2: Least Restrictive Environment (LRE) & Placement Equity				
2.1 Inclusive Setting Access: Students with IEPs across all racial, ethnic, and linguistic groups are educated inside the general education classroom ≥ 80% of the school day at equitable rates **(IDEA, 20 U.S.C. § 1412)**. Identifies disproportionate placement of marginalized students into separate, self-contained, or alternative classrooms.	☐	☐	☐	☐
2.2 Co-Teaching & Inclusion Scaffolding: General and special education staff receive protected co-planning time and training to deliver accommodations and behavioral supports within general education settings before considering more restrictive placements. Evaluates whether placement decisions are driven by student need rather than adult staffing or scheduling limitations.	☐	☐	☐	☐
Domain 3: Exclusionary Discipline & Behavioral Supports				
3.1 Disaggregated Discipline Risk Ratios: Rates of office discipline referrals (ODRs), in-school suspensions (ISS), out-of-school suspensions (OSS), and expulsions show no significant disparity (Risk Ratio < 2.0) by race, ethnicity, or disability status **(U.S. Dept. of Education, 2022)**. Measures lost instructional time and disproportionate exclusionary discipline across student subgroups.	☐	☐	☐	☐
3.2 Objective Behavior Definitions: The student code of conduct defines infractions using clear, observable behaviors rather than subjective categories (e.g., "defiance," "disrespect," "disruption") and mandates instructional or restorative responses prior to removal. Reduces implicit bias in classroom-level referrals and subjective disciplinary escalation.	☐	☐	☐	☐
3.3 Functional Behavioral Assessments (FBAs) & BIPs: Students with IEPs or 504 plans who approach or exceed 5 cumulative days of removal receive timely, function-based FBAs, Behavior Intervention Plans, and Manifestation Determination Reviews. Assesses proactive behavioral support compliance and prevention of repeated removals for students with disabilities.	☐	☐	☐	☐
Domain 4: Underrepresentation in Gifted, Honors, & Advanced Coursework				

Systemic Disproportionality Standard & Evidence Focus	Met	Dev	Gap	N/A
4.1 Universal Screening & Proportional Access: Enrollment in Gifted/Talented, Honors, AP, IB, and Dual Enrollment courses proportionally reflects campus demographics, supported by universal screening rather than teacher-only nominations. Addresses underrepresentation (Risk Ratio < 0.80) of Black, Hispanic/Latino, Indigenous, EL, and low-income students in rigorous pathways.	☐	☐	☐	☐
4.2 Gatekeeping Removal & Academic Scaffolding: Prerequisite barriers (such as minimum GPA cutoffs or parent petition rules) are removed, and embedded tutoring or study seminars support newly enrolled students in advanced classes. Evaluates structural access and retention supports once underrepresented students enter rigorous courses.	☐	☐	☐	☐
Domain 5: Family Partnership, Educator Capacity, & Governance				
5.1 Equitable Family Advocacy & Interpretation: Families from all linguistic and cultural backgrounds have access to trained, independent interpreters, translated IEP/discipline notices, and reciprocal voice in school improvement decisions. Ensures families are equal partners in IEP, placement, and disciplinary meetings rather than passive recipients.	☐	☐	☐	☐
5.2 Ongoing Equity & Bias-Aware Coaching: Leadership facilitates regular data-inquiry cycles and professional learning on culturally responsive pedagogy, trauma-informed de-escalation, and bias mitigation in referral decisions. Assesses sustained institutional commitment to continuous improvement rather than one-time compliance training.	☐	☐	☐	☐

Part 3: Subgroup Risk Ratio & Priority Action Tracker

Disproportionality Indicator	Most Impacted Subgroup(s)	Calculated Risk Ratio	Priority Root-Cause Action
Special Education Identification (Overall / Specific Category)			
Restrictive Placement (< 80% General Education)			
Exclusionary Discipline (ISS / OSS / Total Removals)			
Advanced Coursework / Gifted Underrepresentation			

Root-Cause Analysis Findings, Policy Revisions, & 90-Day Equity Action Plan

Statutory & Regulatory References

1. Individuals with Disabilities Education Act (IDEA), 20 U.S.C. §§ 1412, 1418 (2004); 34 C.F.R. §§ 300.646–300.647 (Significant Disproportionality).
2. U.S. Department of Education, Office of Special Education Programs (OSEP). (2017). *Significant Disproportionality (Equity in IDEA): Essential Questions and Answers*. U.S. Department of Education.
3. U.S. Department of Education, Office for Civil Rights & Office of Special Education and Rehabilitative Services. (2022). *Supporting Students with Disabilities and Avoiding the Discriminatory Use of Student Discipline under Section 504 and IDEA*. U.S. Department of Education.

Partner with Klasey Consulting

Interested in school-wide disproportionality audits, culturally responsive MTSS facilitation, or trauma-informed leadership workshops? Contact us at **info@klaseyconsulting.com** to learn more about our trainings and consultation services.

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