

Missouri Division of Special Education Compliance Standards & Indicators

100-Administrator Checklist

Legal Requirement	Indicator	Documentation
PUBLIC AWARENESS ACTIVITIES: Section 162.685 (1), RSMo; SP(III)		
100.10 Newspaper notice: (NA for Charter Schools)	100.10.a. One (1) published newspaper notice, billing or paid receipt, which indicates the date of publication. 100.10.b. Notice is published on an annual basis prior to November 1.	Public notice; billing; or paid receipt
100.20 Radio or television announcement: (NA for Charter Schools)	100.20.a. Dated notice or billing which indicates the date of airing is present. 100.20.b. Notice is aired on an annual basis prior to November 1.	Public notice; billing; or paid receipt
100.30 Patron Notification:	100.30.a. The agency notifies all parents of children with disabilities under the jurisdiction of the agency through general distribution of written literature once a year prior to November 1. Note for SSD and Component Districts of SSD: <i>Component districts of a Special School District are responsible for the distribution of patron notification materials that meet the requirements of these Standards and Indicators.</i>	Flyers, student handbook, newsletters, etc.
100.40 Posters/notices:	100.40.a. The agency has placed posters/notices in all administrative offices. Note for SSD and Component Districts of SSD: <i>Component districts of a Special School District are responsible for the posting of public awareness materials that meet the requirements of these Standards and Indicators.</i>	Poster; public notice
Content for each public awareness activity is present as follows:		
100.50 Child find responsibilities:	100.50.a. Notice states the agency's responsibility to identify, locate and evaluate children with disabilities, including children with disabilities who are homeless or are wards of the state, and children with disabilities attending private schools who are under the jurisdiction of the agency, regardless of the severity of the disability. This includes: 100.50.a.(1) Children attending private schools, including non-residents if attending private schools within the agency's jurisdiction, 100.50.a.(2) Highly mobile children, such as migrant and homeless children, and 100.50.a.(3) Children who are suspected of having a disability and in need of special education even though they are advancing from grade to grade.	Public notice

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<p>100.60 Intent to serve ALL disability categories:</p>	<p>100.60.a. States the agency's assurance to serve all disability categories, either locally or through contractual arrangement.</p> <p>100.60.b. All disability categories are listed. Notice describes agency's responsibility to refer infants and toddlers suspected of having a disability to Part C early intervention system (First Steps).</p>	Public notice
<p>100.70 Intent to provide FAPE to all children with disabilities:</p>	<p>100.70.a. States the agency's assurance to provide a free appropriate public education (FAPE) to all children with disabilities under the jurisdiction of the agency.</p> <p>100.70.b. Indicates that children with disabilities are students, between the ages of 3 and 21 years, who have been evaluated and identified in accordance with 162.675(2)(3) RSMo and the Individuals with Disabilities Education Act (IDEA).</p>	Public notice
<p>100.80 Notice provided in alternative language formats: 300.612(a)(1); FERPA 99.7(d); SP(II)</p>	<p>100.80.a. Indicates the notice will be provided in alternative language formats.</p>	Public notice
<p>100.90 Access rights of parents to personally identifiable information relating to their children: 300.613; FERPA 99.6(2); SP(II)</p>	<p>100.90.a. The agency assures that personally identifiable information collected, used, or maintained by the agency for the purposes of identification, evaluation, placement or provision of FAPE of children may be inspected and/or reviewed by parents.</p>	Public notice
<p>100.100 Parent's rights to request amendment of records: 300.618; FERPA 99.7 (a)(2); SP(II)</p>	<p>100.100.a. States that parents may request amendment to educational records if the parent believes the record is inaccurate, misleading, or violates the privacy or other rights of their child.</p>	Public notice
<p>100.110 Rights of parents to file complaints concerning alleged failures by the agency to meet the requirements of FERPA: 300.568; FERPA 99.7 (4); SP(II)</p>	<p>100.110.a. Parent may register a complaint with the U.S. Department of Education or the Missouri Department of Elementary and Secondary Education (DESE) if they feel the agency is in violation of the Family Educational Rights and Privacy Act (FERPA).</p>	Public notice

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<p>100.120 Summary of the policies and procedures regarding storage, disclosure to third parties, retention, and destruction of personally identifiable information:</p> <p>300.612(a)(3); FERPA 99.7; SP(II)</p>	<p>100.120.a. Availability (location) of the agency’s policies and procedures regarding storage, disclosure to third parties, retention, and destruction of personally identifiable information.</p>	Public notice
<p>100.130 Assurance that services are provided in compliance with the General Education Provision Act (GEPA):</p> <p>76.301 (4)(ii); Section 444 of the GEPA</p>	<p>100.130.a. Availability (location) of the agency’s assurances that services are provided in compliance with the requirement of GEPA.</p>	Public notice
EDUCATIONAL SURROGATE APPOINTMENT PROCEDURES: 300.519; 162.998 RSMo; SP(V)		
<p>100.140 Agency has written procedures:</p>	<p>The agency’s Compliance Plan includes:</p> <p>100.140.a. Procedures to determine when a student is in need of a surrogate appointment.</p> <p>100.140.b. Procedures to submit <i>Determination of Need</i> forms.</p> <p>100.140.c. Procedures to notify DESE, Division of Special Education, of changes in surrogate appointment and/or student’s status.</p> <p>100.140.d. Description of intent to recruit and assist with training of educational surrogates.</p> <p>100.140.e. Identification of a contact person, if other than administrator of agency’s special education program.</p> <p>Note for SSD and Component Districts of SSD: <i>Component districts of a Special School District must have written procedures for determining when a student needs an educational surrogate, describing the intent to recruit and assist with training of educational surrogates and identifying a contact person, if other than the administrator of special education.</i></p>	Agency Compliance Plan

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<p>100.150 Determine need for educational surrogate:</p>	<p>100.150.a. The agency implements procedures to determine whether or not a student has need of an educational surrogate.</p> <p>Note for SSD and Component Districts of SSD: <i>Component districts of a Special School District must assist in sharing information to assist in making a determination of need for assignment of an educational surrogate.</i></p>	<p>Agency records; student files</p>
<p>100.160 Upon agency determination/notification of suspected need, the agency investigates and determines the need for surrogate appointment:</p> <p>(NA if agency has no identified need for educational surrogate appointments)</p>	<p>100.160.a. Documentation is present that within thirty (30) days the agency investigated the need for an educational surrogate appointment for any children with disabilities suspected of needing special education services upon:</p> <p style="margin-left: 20px;">100.160.a.(1) Enrollment.</p> <p style="margin-left: 20px;">100.160.a.(2) Referral for special education evaluation.</p> <p style="margin-left: 20px;">100.160.a.(3) Notification that the child has no identified parent, guardian, or person acting as a parent.</p>	<p>Agency records; student files</p>
<p>100.170 Submit <i>Determination of Need for Educational Surrogate Appointment</i>:</p> <p>(NA if agency has no identified need for educational surrogate appointments)</p>	<p>100.170.a. Request for educational surrogate appointment submitted to DESE, Division of Special Education, within ten (10) days of the determination of need.</p> <p>100.170.b. A copy of the DESE signed/approved Determination of Need for Educational Surrogate Appointment form and surrogate appointment letter is maintained in the student's file.</p>	<p>Agency records; student files</p>
<p>100.180 Change in child's educational surrogate status:</p> <p>(NA if agency has no identified need for educational surrogate appointments)</p>	<p>100.180.a. Documentation is present that DESE was notified of the need for a change in the child's educational surrogate status within thirty (30) days of child's change in status (i.e. child graduates, child found ineligible under IDEA, parent or guardian re-appears to represent the child, child placed in foster care.)</p>	<p>Agency records; student files</p>

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<p>100.190 Change in the specific educational surrogate appointment:</p> <p>(NA if agency has no identified need for educational surrogate appointments)</p>	<p>100.190.a. Documentation is present that DESE was notified of any changes that are needed for the surrogate appointment within thirty (30) days of the agency’s awareness of the needed change (i.e., surrogate resignation, conflict of interest, etc.).</p>	Agency records; student files
<p>100.200 Annual surrogate evaluation(s):</p> <p>(NA if agency has no identified need for educational surrogate appointments)</p>	<p>100.200.a. Documentation is present that annual evaluations for educational surrogates are completed and submitted to DESE, Division of Special Education, by July 1 of each year</p> <p style="text-align: center;">OR</p> <p>100.200.b. Prior to a recommendation for termination of the surrogate’s appointment.</p>	Agency records; student files
<p>100.210 Evidence of recruiting efforts for educational surrogate:</p> <p>(NA if agency has no identified need for educational surrogate appointments)</p>	<p>100.210.a. Documentation is present of agency’s efforts for recruiting individuals to serve as educational surrogates.</p> <p>Note for SSD and Component Districts of SSD: <i>Component districts of a Special School District must assist the SSD in recruitment of individuals to be trained as educational surrogates.</i></p>	Agency records; student files
OTHER ADMINISTRATIVE ITEMS		
<p>100.220 Confidentiality training: 300.572 (c); SP (II)</p>	<p>100.220.a. Written verification of confidentiality training for ALL persons collecting or using personally identifiable data is present. Training is provided for all staff and subsequently for new hires.</p> <p>NOTE: Documentation may include dates of training, content agenda, and a list of participants.</p> <p>Note for SSD and Component Districts of SSD: <i>For agencies associated with Special School districts, implementation of requirements related to confidentiality of special education records is a matter of separate compliance for the SSD and component district based upon possession of the records. Each district must have policies in place to assure compliance with these regulations.</i></p>	Agency records

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<p>100.230 Positions of employees having access to personally identifiable data: 300.623 (d); SP (II)</p>	<p>100.230.a. A listing of positions of current employees having access to personally identifiable data is posted at student file location(s) or other central location(s).</p> <p>Note for SSD and Component Districts of SSD: <i>For agencies associated with Special School districts, implementation of requirements related to confidentiality of special education records is a matter of separate compliance for the SSD and component district based upon possession of the records. Each district must have policies in place to assure compliance with these regulations.</i></p>	Posted listing; agency files
<p>100.240 Paraprofessional credentials: SP (VI)</p>	<p>100.240.a. Documentation is present that special education paraprofessionals are properly credentialed.</p>	Agency records; personnel files
<p>100.250 Paraprofessionals assigned to Title I School wide Projects providing instructional support:</p>	<p>Paraprofessionals engaged in any instructional support activities must have sixty (60) college hours, or an Associate Degree, or have passed the State approved paraprofessional assessment with an established minimum score.</p>	Personnel file
<p>100.260 Paraprofessional assigned to buildings designated as Title I School-wide (Building) Projects engaged solely in activities of personal assistance:</p>	<p>Paraprofessionals assigned to buildings designated as Title I School-wide (Building) Projects engaged solely in activities of personal assistance (i.e. feeding, mobility, toileting, etc.) have a High School Diploma or GED</p>	Personnel file
<p>100.270 Paraprofessionals assigned to buildings not designated as Title I School-wide (Building) Projects</p>	<p>Paraprofessionals assigned to buildings not designated as Title I School-wide (Building) Projects have a High School Diploma or GED.</p>	Personnel file
<p>100.280 Paraprofessional training: SP (VI)</p>	<p>Verification of orientation training necessary for each paraprofessional to perform duties as assigned is present. Paraprofessionals who do not hold teaching certificates are required to have received initial orientation plus fifteen (15) clock hours of training during their first school year of employment. A minimum of ten (10) clock hours each year thereafter is also required. Verification includes:</p> <p>100.280.a. Orientation (dates, content agenda, and participants).</p> <p>100.280.b. Training (dates, content agenda, number of clock hours, and participants).</p> <p>100.280.c. Clock hours of training provided.</p>	Agency records; personnel files

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<p>100.290 Inventory control, placement, and use: SP (IX)</p> <p>EDGAR 74.34</p>	<p>100.290.a. An inventory of items costing in excess of \$1000 that were purchased with federal funds is completed at least once every two (2) years.</p> <p>100.290.b. Documentation indicates that these items are restricted to use with identified children with disabilities.</p> <p>Inventory records include the following:</p> <p>100.290.c. Description of the equipment (including model number, if any)</p> <p>100.290.d. Serial number</p> <p>100.290.e. Identification of the grant under which the recipient acquired the equipment</p> <p>100.290.f. Information needed to calculate federal share of equipment</p> <p>100.290.g. Acquisition date and unit cost</p> <p>100.290.h. Location, use and condition of the equipment, and date information was reported</p> <p>100.290.i. Pertinent information on transfer, replacement, or disposition of the equipment</p>	<p>Agency records; inventory listing</p>
<p>100.300 Private school program planning: CFR 300.134; SP IV</p>	<p>100.300.a. Consultation occurs at least annually and is conducted prior to the district’s decision about the use of the proportionate share of funds described in IDEA.</p> <p>100.300.b. A written affirmation signed by the representatives of participating private schools</p> <p style="text-align: center;">OR</p> <p>if representatives do not provide affirmation, a copy of documentation is forwarded to DESE of the consultation process.</p> <p>Documentation addresses the agency’s timely and meaningful consultation with appropriate representatives of parentally placed private school children with disabilities to address the following:</p> <p>100.300.c. How child find activities will be implemented</p> <p>100.300.d. Which private school children with disabilities will receive services</p> <p>100.300.e. What services will be provided</p> <p>100.300.f. How and where the services will be provided, including time and location of the services provided</p> <p>100.300.g. How the services provided will be evaluated</p> <p>NOTE (1): In Missouri, home-schooled children are included in this population.</p>	<p>Meeting notes; phone log; correspondence</p>

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	<p>NOTE (2): Appropriate representatives may include parents, private school administrators, teachers, and/or principals.</p> <p>NOTE (3): The LEA shall make the final decisions with respect to the services to be provided to eligible private school children.</p> <p>NOTE (4): Missouri Constitution and case law prohibit the provision of services, equipment, materials, or personnel on the premises of a private school.</p> <p>Note for SSD and Component Districts of SSD: <i>Component districts of a Special School District must adopt appropriate procedures and practices to allow participation of private school students.</i></p>	
<p>100.310 Hearing aid(s) or external components of surgically implanted medical devices 300.113(a)(b)(1); SP(IV)</p>	<p>Documentation indicates the hearing aid(s) or external components of surgically implanted medical devices are:</p> <p>100.310.a. Monitored to ensure proper functioning.</p> <p>NOTE: If other assistive listening devices are used, such as an auditory training unit (ATU), their working order should also be verified.</p>	Student files
<p>100.320 Response to Intervention Model for the Identification of Specific Learning Disability</p>	<p>If the agency is using a Response to Intervention model for the identification of Specific Learning Disability, the agency has written procedures for implementation that, at a minimum, incorporate guidelines developed by the SEA.</p>	
CONTRACTUAL SERVICES: 300.402; SP(VIII)		
<p>100.330 Public agency contracts for a child's services through a private agency:</p>	<p>100.330.a. Contractual services are arranged with only private agencies approved by the State Board of Education.</p> <p>100.330.b. All services are provided in accordance with IEP.</p>	Student files; copies of contracts
STATE BOARD OPERATED PROGRAM—MISSOURI SCHOOL FOR THE BLIND (MSB): SP(X)		
<p>100.340 The following items are present:</p>	<p>The public agency maintains the following:</p> <p>100.340.a. A current evaluation report</p> <p>100.340.b. The current IEP</p>	Student files
STATE BOARD OPERATED PROGRAM—MISSOURI SCHOOL FOR THE DEAF (MSD): SP(X)		
<p>100.350 The following items are present:</p>	<p>The public agency maintains the following:</p> <p>100.350.a. A current evaluation report</p>	Student files

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Legal Requirement	Indicator	Documentation
	100.350.b. The current IEP	
STATE BOARD OPERATED PROGRAM—STATE SCHOOLS FOR THE SEVERELY HANDICAPPED (SSSH): SP(X)		
100.360 The following items are present:	The public agency maintains the following: 100.360.a. A current evaluation report 100.360.b. The current IEP	Student files
DESTRUCTION OF INFORMATION: 300.624; SP (II)		
100.370 Notification of Destruction of information provided prior to destruction of information:	100.370.a. Parent is provided notification prior to the destruction of information.	Notification
100.380 Notification includes:	The Notification of Destruction of Information includes the following: 100.380.a. Records to be destroyed specifically listed by category (IEPs, test protocols, etc.) 100.380.b. Statement that indicates the reason for destruction. 100.380.c. Proposed date (m/d/y) of record destruction. 100.380.d. Statement that records are maintained for a minimum of three (3) years from the date the child no longer received special education and related services. NOTE (1): A permanent record containing the student’s name, address, phone number, grades, attendance record, classes attended, grade level completed, and year completed may be retained without time limitation. NOTE (2): Refer to individual agency policies for additional information pertaining to this issue.	
RELEASE OF INFORMATION: 300.622; SP (II)		
100.390 Consent for Release of Information is present:	100.390.a. Consent for Release of Information was obtained prior to release of records. The following are some applicable <u>exceptions</u> to the consent requirement specified in FERPA: <ul style="list-style-type: none"> ○ School officials, ○ Schools in which a child seeks or intends to enroll, ○ Federal, state, and local authorities involved in an audit, evaluation, or monitoring for compliance with 	Release form; student files

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Legal Requirement	Indicator	Documentation
	<p style="text-align: center;">education programs, and</p> <ul style="list-style-type: none"> o Investigations in connection with financial aid, such as a college loan. <p>NOTE: For a complete listing of exceptions, see 34 CFR 99 FERPA Regulations.</p>	
<p>100.400 Content of the Release of Information:</p>	<p>The Release of Information contains the following content:</p> <p>100.400.a. A dated signature of parent or eligible student (Date represents date permission given for release of information.)</p> <p>100.400.b. Specific records to be disclosed</p> <p>100.400.c. A statement describing reason(s) for disclosure</p> <p>100.400.d. Individual(s) or agency(ies) to which disclosure is to be made</p>	<p>Release form; student files</p>
TRANSFER OF RIGHTS: 300.520(a)(3); SP (V)		
<p>100.410 Notification of the transfer of parental rights at age of majority:</p>	<p>100.410.a. Upon the child's 18th birthday, the child and the parents are notified of the transfer of rights.</p>	<p>Student files</p>
INDEPENDENT EDUCATIONAL EVALUATION (IEE): 300.502; SP (V)		
<p>100.420 Information provided to parent regarding policies for independent education evaluation (IEE):</p>	<p>100.420.a. Upon request for an IEE, documentation is present that the public agency provided the parent information (or a listing) about where an independent educational evaluation may be obtained and the agency criteria applicable for independent educational evaluations.</p>	<p>Agency records; student file</p>
<p>100.430 Provided at public expense:</p>	<p>100.430.a. The IEE is provided at public expense consistent with provisions listed in the agency's policies.</p> <p>NOTE: A parent is entitled to only one independent evaluation at public expense each time the public agency conducts an evaluation with which the parent disagrees.</p>	<p>Agency records; student file</p>
<p>100.440 Results considered by the agency:</p>	<p>100.440.b. The agency documents consideration of the IEE results if it meets agency criteria.</p>	<p>Agency records; student file</p>
NATIONAL INSTRUCTIONAL MATERIALS ACCESSIBILITY CENTER (NIMAC)/NATIONAL INSTRUCTIONAL MATERIALS ACCESSIBILITY STANDARDS (NIMAS): 300.172; SP VII		

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100.450 Assurance regarding adoption of NIMAS 20 U.S.C 1412(a)(23)(A)(D); SP	100.450.a. The agency has adopted the National Instructional Materials Accessibility Standards (NIMAS) for purposes of providing instructional materials to blind children and youth or other children and youth with print disabilities	Assurance statement
100.460 Assurance regarding Agency coordination with NIMAC	100.460.a. The public agency has assured that it will coordinate with the National Instructional Materials Access Center (NIMAC)	Assurance statement
	OR	
	100.460.b. The agency has indicated that it will not coordinate with the National Instructional Materials Access Center. In this case, the agency assures that it will provide instructional materials to blind children and youth or other children and youth with print disabilities in a timely manner.	

HIGHLY QUALIFIED TEACHERS (HQT): SP I

100.470 Subject matter competency for HQT	Special Education teachers are credentialed in accordance with Highly Qualified Teacher Provisions of No Child Left Behind (NCLB) and IDEA (300.18) Special Education teachers who do not directly instruct core academic subjects or provide only consultation to subject area teachers: 100.470.a. Hold a bachelor's degree 100.470.b. Hold appropriate special education certification Special Education teachers who teach core academic subjects: 100.470.c. Hold a bachelor's degree 100.470.d. Hold appropriate special education certification 100.470.e. Demonstrate subject-matter competency in every core subject taught either through <ul style="list-style-type: none"> ○ Subject area certification (All teachers all levels) ○ Praxis/CBASE Elementary (K-8) or secondary teachers certificated after 1988 ○ Elementary certificated special education teacher teaching any student or secondary special education teacher teaching Map-A students only ○ Subject area Praxis (All teachers, all levels) or ○ HOUSSE Rule (House Objective Uniform State Standard of Evaluation) NOTE: Core academic subjects are English, reading or language arts, mathematics, science, foreign languages, civics and government, economics, arts, history, and geography.	Personnel files
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OTHER ADMINISTRATIVE ITEMS for Special School Districts and Component Districts of a Special School District: SP(IX)

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Legal Requirement	Indicator	Documentation
100.480 Component collects and shares needs assessment for PD activities as related to students with disabilities	100.480.a. Documentation is present that the component district of a Special School District has collected and shared the needs assessment information collected by their Professional Development Committee (PDC) as it relates to students with disabilities.	PDC needs assessment
100.490 Component has policies and procedures for staff participation in PD activities developed by SSD	100.490.a. The component district of a Special School District has policies and procedures in place that direct the participation of their general education personnel in activities developed by the special school district and the component district.	Policies and Procedures
100.500 The SSD coordinates activities with the component PD plans	The Special School District's professional development plan includes a description of the process used by the Special School District to coordinate with the component district's professional development plan. This plan should include activities for the following personnel <ul style="list-style-type: none"> ○ Administrators (including superintendents and principals) ○ General and special educators ○ Related services personnel ○ Paraprofessionals 	Professional Development Plan
INSTRUCTIONAL RESOURCES AND COMPARABLE FACILITY: SP(IX)		
100.510 Policies and practices that assure allocation of appropriate class room instructional space	100.510.a. The amount of instructional space provided by each component district is proportionate to the number of students with disabilities identified as residents of the component district; students with disabilities who otherwise attend a private, parochial, parish or home school; and, for St. Louis County only, students with disabilities served by the component district pursuant to the voluntary desegregation plan. 100.510.b. Each special and component district has ensured that the facilities provided to students with disabilities are comparable to those available to nondisabled students within that building and/or district. 100.510.c. Relocation of instructional space for students with disabilities within the component district does not occur more frequently than the relocation of space for general education student services.	Building specifications and floor plans
100.520 Policies and practices that	Each special and component district shall assure the availability and provision of instructional materials to support the general education curriculum, including the following:	Inventory

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assure that availability and provision of instructional materials and technology to support the general education curriculum	<ul style="list-style-type: none"> ○ Current textbooks ○ Teacher manuals and supplements ○ Instructional technology, including hardware, software, and multimedia that is accessible to students with disabilities either directly by features incorporated within the technology or by compatibility with add-on components ○ Other materials that are routinely designated for the use of nondisabled students 	
100.530 Policies and practices that assure the access for special education teachers to instructional supports available to all teachers	100.530.a. Each special and component district shall assure access of special education teachers to instructional supports generally available to all teaching staff (e.g., duplicating services, computer technology, library/media resources, etc.)	Policies and Procedures
Districts that have been identified as having <u>disproportionate representation</u> of racial and ethnic groups in special education, which may include identification of children with a particular impairment: 300.600 (d) (3); SP VI		
100.540 Disproportionate representation	A review of monitoring data, including policies practices and procedures, indicated the disproportionality is not the result of inappropriate practices.	Monitoring results
Districts that have been identified as having <u>significant disproportionality</u> based on race and ethnicity, which may include identification of children with a particular impairment, the placement in particular educational settings of these children, and the incidence, duration, and type of disciplinary actions, including suspensions and expulsions: 300.646; SP VI; SP VII		
100.550 Significant disproportionality	A review of the district's policies, procedures and practices used in the identification or placement of students with disabilities indicated there is not a need for the district to revise its policies, practices or procedures to comply with the requirements of IDEA.	Monitoring results
100.560 Reservation of funds to provide comprehensive, coordinated early intervening services to serve children in the LEA	Any LEA identified as having significant disproportionality, regardless of the results of a review of policies, practices and procedures must reserve the maximum amount of funds under section 613(f) of the Act to provide comprehensive, coordinated early intervening services to serve children in the LEA, particularly, but not exclusively, children in those groups that were significantly overidentified under 300.646 (a).	District records related to budget and services for EIS
100.570 Public reporting of policies, procedures or practices	LEAs required to revise policies, procedures or practices related to findings of significant disproportionality must publicly report on these revisions.	Public reports