

Root Cause Analysis & Disproportionality Review Template

A Structured Protocol for Identification, Discipline & Placement Data Flags

Purpose: When data review identifies significant disproportionality (e.g., in identification, discipline, or placement by race/ethnicity or disability category) or a persistent compliance gap, IDEA and OSEP guidance call for root cause analysis rather than surface-level fixes. This template structures that process using a systems-level inquiry model.

1. Flag Identification

Field	Entry
Data flag (what triggered this review)	[e.g., risk ratio ≥ 2.0 for Black students in ED identification]
Data source and timeframe	[state data system, years reviewed]
Comparison group	[district baseline, state average, prior 3-year trend]

2. Root Cause Inquiry — The 5 Whys

Facilitate with a cross-functional team (special education, general education, MTSS/RTI lead, data/assessment staff, family representative where possible). Push past the first-level answer at least 3–5 levels.

- Why 1: Why is this disproportionality occurring? [entry]
- Why 2: Why does that condition exist? [entry]
- Why 3: Why does that condition exist? [entry]
- Why 4: Why does that condition exist? [entry]
- Why 5 (system-level root cause): [entry]

3. Systems-Level Contributing Factor Checklist

Evidence-based frameworks (e.g., OSEP's Equity Toolkit, NCSI) point to these common systemic contributors — check any that apply and gather supporting evidence for each.

- Inconsistent or absent MTSS/RTI implementation before referral
- Referral or discipline decision-making not guided by written, objective criteria
- Evaluation tools not validated for the student's cultural/linguistic background
- Implicit bias in behavior perception or referral patterns (not yet examined through data)
- Inequitable access to high-quality core instruction prior to referral
- Gaps in staff training on culturally responsive practice or de-escalation
- Placement decisions defaulting to program availability rather than individualized need

4. Evidence Review Table

Contributing Factor	Supporting Evidence	Confirmed / Ruled Out

5. Coordinated Early Intervening Services (CEIS) Consideration

If significant disproportionality is confirmed under 34 CFR §300.646, districts must reserve funds for Comprehensive CEIS to serve students in the identified group, particularly those in K–12 not currently identified for special education, and must review/revise policies, practices, and procedures.

- CEIS activities planned: [entry]
- Policy/practice/procedure changes required: [entry]
- Public reporting requirement met: [entry]

6. Action & Monitoring Plan

Action Step	Owner	Timeline	Progress Measure

Evidence Base & Sources

- 34 CFR §300.646–300.647 (Significant Disproportionality; Comprehensive Coordinated Early Intervening Services).
- U.S. Department of Education — 2016 Equity in IDEA Final Rule and OSEP guidance on the standard methodology for calculating significant disproportionality.
- National Center for Systemic Improvement (NCSI) — root cause analysis protocols for state/district equity work.
- OSEP Equity Toolkit and IDEA Data Center technical assistance on disproportionality review processes.
- Skiba, R. J., et al. — peer-reviewed research on disproportionality in special education identification and discipline.

This resource synthesizes federal statute, regulation, and peer-reviewed / technical-assistance-center guidance current as of publication. It is an instructional tool, not legal advice; consult your district's legal counsel and current state regulations for compliance decisions.