

Mandatory Comprehensive Coordinated Early Intervening Services (CCEIS) Q&A and Allowable Usage of CCEIS Funds



1. When is the provision of Comprehensive Coordinated Early Intervening Services required?

Under IDEA Regulation 34 CFR §300.646, a State must determine if significant disproportionality based on race and ethnicity is occurring in the State and the AUs with respect to:

- a) The identification of children as children with disabilities, including the identification of children as children with disabilities in accordance with a particular impairment;
- b) The placement in particular educational settings; and
- c) The incidence, duration, and type of disciplinary removals from placement, including suspensions and expulsions.

An administrative unit (AU) determined to be significantly disproportionate must use the maximum amount (15 percent) of funds allowable for Comprehensive Coordinated Early Intervening Services (CCEIS). The AU must use funds reserved for CCEIS to identify and address the factors contributing to the significant disproportionality in the AU for the identified category. As part of the overall process, the AU must also review, modify, or eliminate any policy, practice, or procedure it identifies as contributing to the significant disproportionality. Any change to policy, practice, or procedure regarding the identification and placement of students with disabilities must be publicly reported and consistent with the requirements of IDEA and its implementing regulations.

IDEA also distinguishes between when CCEIS is required activity and when Coordinated Early Intervening Services (CEIS) may be used by an AU on a voluntary basis. For more information regarding voluntary CEIS versus mandatory CCEIS please see Q4 below.

2. What are Comprehensive Coordinated Early Intervening Services?

Comprehensive Coordinated Early Intervening Services (CCEIS) are for children in those groups that were significantly over-identified from age 3 through grade 12. These set aside funds should focus particularly, but not exclusively, on the children in those groups that were significantly over-identified. These funds may be used to serve children not currently identified as needing special education or related services, but who need additional academic and behavioral support to succeed in a general education environment, as well as children with disabilities.

The Individuals with Disabilities Education Act (IDEA) and its implementing regulations identify the activities that may be included as: (1) professional development for teachers and other school staff to enable such personnel to deliver scientifically based academic and behavioral interventions, including scientifically based literacy instruction, and where appropriate, instruction on the use of adaptive and instructional software; and (2) providing educational and behavioral evaluations, services, and supports, including scientifically based literacy instruction. 20 U.S.C. §1413(f)(2); 34 C.F.R §300.226(b).

For a more complete listing of activities which may be allowable under CCEIS please see Q11 below.



3. How does Colorado determine significant disproportionality?

Colorado examines significant disproportionality among its AUs annually in accordance with the methods described in 34 CFR §300.647. Colorado examines each AU's three previous school years of enrollment and discipline data and identifies the AU only when it meets all criteria for significant disproportionality for three consecutive years. For more details, please see [Colorado's definition of significant disproportionality](#) on the CDE website.

4. May an AU limit CCEIS solely to members of the racial or ethnic group for which significant disproportionality was identified?

No. The requirement in 34 CFR §300.646(d)(2) is to provide CCEIS *primarily* to children in those groups that were significantly over-identified. For example, assume an AU's data show significant disproportionality in the identification of African-American students as children with disabilities and that the majority of these students are identified in 4th and 5th grades in six of the AU's 15 elementary schools. One appropriate way an AU could implement CCEIS would be to direct CCEIS funds to all nondisabled 3rd and 4th grade children in need of additional academic or behavioral support in those six schools. This support would be provided to *all* 3rd and 4th grade students in order to intervene prior to the grade when significant disproportionality was identified. It would not be appropriate, however, to limit eligibility for CCEIS only to nondisabled 3rd and 4th grade African-American students in those schools who were in need of additional academic or behavioral support.

5. Can an AU provide CCEIS to serve children of the racial or ethnic group that is significantly under-identified?

Yes. If an AU finds that a factor contributing to the overrepresentation of one racial or ethnic group is the under-identification of a different racial group or groups, the AU may use IDEA Part B funds reserved for CCEIS to address the causes of that under-identification. For example, assume an AU's data show significant over-identification of White students as children with specific learning disabilities. Root cause analysis shows an under-identification of Hispanic students who are also English Language Learners is contributing to the apparent over-identification of White students. Further analysis indicates that the AU does not have practices or procedures to adequately address linguistic or cultural barriers that may be interfering with the appropriate identification of Hispanic, English Language Learners. In this case, the AU may use CCEIS funds to develop and implement practices to ensure appropriate identification.

6. How may an AU use CCEIS funds for professional development?

CCEIS funds may be used to provide professional development to all personnel who are responsible for students who need additional academic and behavioral supports to succeed in a general education environment, but who have not been identified as needing special education. Under limited circumstances, personnel who are solely responsible for students receiving special education services or students who do not need additional support may participate in professional development funded with CCEIS funds. These personnel may participate so long as the cost of the professional development does not increase, the quality of the professional development does not decrease, and their participation would not result in the exclusion of personnel who are responsible for students who need additional support.



7. What are the reporting requirements for CCEIS and how should an AU track students who receive CCEIS?

IDEA Regulation 34 C.F.R. § 300.226 requires AUs implementing CCEIS to report to the State annually on the number of children who received CCEIS, and the number of children who received CCEIS *and* subsequently received special education and related services during the preceding 2-year period. This data is collected to determine the impact of early intervening services on children and to determine if these services reduce the number of referrals for special education. An AU that develops and maintains CCEIS would report the number of children receiving CCEIS. The AU would also report the number of those children who are eventually identified as IDEA eligible no more than two years after they received CCEIS. In Colorado, AUs that implement CCEIS will report the required information on the students who received CCEIS in the IEP Interchange during Special Education End of Year Data Collection. Once the information is submitted, CDE tracks the student specific information for the preceding 2-year period. AUs that implement CCEIS must work closely with their Student Information System and IEP system personnel to determine the best way to track the current status of students who received CCEIS services throughout the school year. The details of the CCEIS data collection are posted in the [CDE Data Pipeline webpage](#).

8. How should an AU report students who receive CCEIS when funds are used for professional development or a school-wide intervention initiative?










It would be appropriate for an AU to report the number of students in need of additional support who received instruction from personnel who participated in the professional development program. Because this data is intended to measure the effectiveness of CCEIS in reducing the number of *inappropriate* referrals for special education, it would not be appropriate for the AU to report every student who was taught by these personnel if some of the students were not in need of additional support or were receiving special education services at the time of the professional development. For example, an AU would report a student receiving targeted intervention and support from a teacher who participated in the professional development program but would not report a student receiving universal instruction from the same teacher. A similar method might be used to report students who benefited from a school-wide intervention supported with CCEIS funds.

9. How should an AU report students who received CCEIS when funds are used to provide behavioral and educational evaluations?

AUs may use CCEIS funds to provide behavioral and educational evaluations to determine the supports that are needed by students to succeed in a general education environment. However, funds may not be used for evaluations that are intended to determine eligibility for special education and related services. Students who are evaluated to determine the supports necessary for success in a general education environment should be reported as receiving CCEIS.

10. What can CCEIS funds be spent on?

Both CEIS and CCEIS should target students who need additional academic and behavioral supports to succeed in a general education environment. In addition, CCEIS must be used to primarily, but not exclusively, serve children in those groups that were significantly over-identified. The following chart gives examples of budget items/activities that are appropriate to be funded by the CEIS/CCEIS set-aside funds.

Symbol	Budget Item / Activity
	AFTER SCHOOL PROGRAMMING: CEIS funds may be used to provide academic and behavioral interventions after school under certain circumstances. CEIS funds may not be used for after school programming open to all students. CEIS is intended for students in need of additional academic and behavioral supports to succeed in general education, but who have not been identified as students with disabilities.
	AIDES: CEIS funds may be used for salaries and fringe benefits of aides that are AU employees, or for costs for contracted aides, providing services to students receiving CEIS. Aides must work under the supervision of an appropriately licensed teacher and perform duties consistent with the role of an aide, while not assuming the role of a teacher.
	ALTERNATIVE EDUCATION / AT-RISK PROGRAMMING: CEIS funds may not be used for alternative or at-risk programming that <i>replaces</i> universal/core programming. CEIS funds may be used only in programming that provides interventions <i>in addition to</i> universal/core programming.
	BUS, VAN or OTHER STUDENT TRANSPORTATION COSTS: Not allowed.
	CHILD FIND ACTIVITIES: A district may not use CEIS funds for activities aimed at identifying, locating, or evaluating students with disabilities including screening for pre-school, hearing, or vision disabilities. Child Find costs may be charged to the flow-through or preschool portion of the IDEA grant.
	COACHES (Mentors): A district may hire or contract with individuals or organizations for mentoring / coaching services to help carry out activities funded by CEIS. A mentor or coach, unless appropriately licensed, may not provide instruction to students. Mentors and coaches may support, reinforce, or follow-up on instruction provided by and under the supervision of an appropriately licensed general education teacher.
	COMPUTER NETWORK COSTS: Not allowed.
	CORE CURRICULUM: Universal/core activities are designed to provide high quality instruction to all students in a grade, school, or AU. These activities may not be funded with CEIS dollars. CEIS funds may be used to fund supplemental academic and behavioral interventions for students determined to need additional academic and behavioral supports to succeed in general education.
	CREDIT RECOVERY PROGRAMS: Costs of credit recovery programs may not be funded by CEIS. Credit recovery programs are not an evidence based academic intervention but are instead used to help students (who may not be struggling academically) access and complete missed core curriculum.











Allowed



Not Allowed



Possibly allowed, special requirements or additional information

Symbol	Budget Item / Activity
	ELECTRONIC DEVICES: CEIS funds may be used to purchase computers, laptops, touch screen devices, camcorders, DVD players, etc., if the devices will be used primarily for the delivery of academic or behavioral interventions in an established multi-level system of supports. The AU must track these devices and ensure that their usage aligns with the AU's activities as reported in the approved CEIS Plan narrative and budget.
	FURNITURE / OFFICE EQUIPMENT: Desks, tables, chairs, file cabinets, and other furniture or office equipment, not allowed.
	EVALUATIONS FOR SPECIAL EDUCATION ELIGIBILITY DETERMINATIONS: Evaluations, including outside evaluations, for determining eligibility for special education services are not considered part of the delivery of academic or behavioral interventions and thus may not be funded with CEIS set-aside. Costs of special education referrals and evaluations are eligible costs under IDEA flow-through.
	EXTENDED CONTRACTS / EXTENDED HOURS: CEIS set-aside funds may be used to pay for extended contracts or extended hours for staff directly involved with the coordination, supervision, or delivery of academic or behavioral interventions and progress monitoring.
	GUIDANCE COUNSELOR / PSYCHOLOGIST / SOCIAL WORKER SALARIES – SCHOOL BASED: Examples of activities that may be funded with CEIS include a school guidance counselor, school psychologist, or social worker's efforts to implement behavioral interventions, progress monitoring, other CEIS evaluations, and related professional development. School guidance counselors may not deliver reading or math instruction under CEIS funding unless they also hold the appropriate license to deliver reading or math instruction.
	INCENTIVES for STUDENTS: Nominal items of low value may be purchased with CEIS funds to be used as part of the coordinated delivery of academic or behavioral interventions. The items should be educational in nature. The amount charged to the CEIS set-aside grant must be reasonable and prudent. The following are not allowed incentives: cash, cash cards, gift cards, or electronic devices (such as iPads, Kindles, etc.).
	INFORMATION TECHNOLOGY STAFF SALARIES: Although IT staff costs may be linked to specific CEIS activities, the reasonable ability of the AU to determine actual eligible salary and benefit costs is low. The risk of unsupported costs charged to the CEIS set-aside outweighs the benefit of charging IT salaries to the grant.
	INSTRUCTIONAL MATERIALS: Instructional materials purchased with CEIS funds must be exclusively used for delivering academic or behavioral interventions to students who, through a universal screening process, have been determined to be struggling. CEIS funds may not be used to purchase materials used in the core instructional program intended for all students.












Allowed



Not Allowed



Possibly allowed, special requirements or additional information

Symbol	Budget Item / Activity
	OCCUPATIONAL OR PHYSICAL THERAPIST SALARIES: OT and PT are related services and may be provided only to students with disabilities in accordance with an IEP, 504 or service plan.
	PARAPROFESSIONAL SALARIES: Salaries and fringe benefits for AU paraprofessional employees or costs for contracted paraprofessionals who: <ul style="list-style-type: none"> Participate in professional development to enable them to support the delivery of scientifically based academic and behavioral interventions, and, if appropriate, the use of adaptive and instructional software. Support, reinforce or follow-up on the provision of educational and behavioral services provided by and under the supervision of an appropriately licensed educational or behavioral professional.
	PROFESSIONAL DEVELOPMENT SERVICES: A district may purchase professional development services provided it is “for teachers and other school staff to enable such personnel to deliver scientifically based academic and behavioral interventions, including scientifically based literacy instruction, and, where appropriate, instruction on the use of adaptive and instructional software; and providing educational and behavioral evaluations, services, and supports, including scientifically based literacy instruction.”
	PROGRESS MONITORING ACTIVITIES / SOFTWARE: CEIS funds may be used for progress monitoring of supplemental interventions provided to those students determined to need additional academic and behavioral supports to succeed in general education. CEIS funds may not be used for universal screening or assessment administered to all students in a grade, school, or AU.
	REMODELING / RENOVATION: Remodeling or renovation does not meet the criteria for the utilization of CEIS set-aside funds.
	RENT or OCCUPANCY COSTS: Rent or occupancy costs do not meet the criteria for the utilization of CEIS set-aside funds.
	ROOT-CAUSE ANALYSIS: AUs identified with significant disproportionality must identify the factors contributing to the disproportionality as part of CCEIS. A part of CCEIS funds may be used to conduct the root-cause analysis. Voluntary CEIS funds may not be used for root-cause analysis.
	RtI/MTSS COORDINATOR SALARY: CEIS funds may be used for salaries and fringe benefits, or portion thereof, of staff that directly coordinate or supervise the delivery and monitoring of academic or behavioral interventions. RtI Coordinator costs must align with the AU’s activities as reported in the CEIS narrative. CEIS funds may not be used to fund coordination of services intended to benefit all students or only students with disabilities.
	SOFTWARE (Instructional Media): Software purchased with CEIS funds must be exclusively used in the delivery of academic or behavioral intervening services, which includes instruction and progress monitoring. CEIS funds may not be used to purchase software used in the core instructional program nor universal screening intended for all students.









Allowed



Not Allowed



Possibly allowed, special requirements or additional information

Symbol	Budget Item / Activity
	TEACHER SALARIES - GENERAL EDUCATION: Under CEIS funding, general education teachers may provide academic interventions, behavioral interventions, assessments and receive/deliver professional development. Any staff charged to a federal grant must be appropriately licensed in the area in which they are providing academic instruction.
	SPECIAL EDUCATION TEACHER SALARIES: Special education staff may not be funded with CEIS dollars to deliver special education to students. Special Education Teachers may be compensated through CEIS to deliver Tier 2 and Tier 3 interventions to students needing such interventions. In such instances, proper time and effort records must be kept.
	SUBSTITUTE TEACHER SALARIES: Districts may budget for general education substitute teachers to help carry out activities funded by CEIS, including providing opportunities for teachers to participate in professional development and other related CEIS activities.
	TRAVEL (STAFF): Travel costs must be generated as a result of implementing activities funded by CEIS, such as professional development.
	TUTORS: A district may hire or contract with individuals or organizations for tutoring services to carry out CEIS activities. Tutors may: <ul style="list-style-type: none"> Participate in or provide professional development to enable teachers and other school staff to deliver scientifically based academic and behavioral interventions, and, if appropriate, the use of adaptive and instructional software. Support, reinforce or follow-up on the provision of educational and behavioral services provided by and under the supervision of an appropriately licensed general education teacher.
	UNIVERSAL SCREENING COSTS: CEIS funds may be used to provide services only to students in need of additional academic or behavioral support who have not been identified as eligible for special education. CEIS funds may not be used for activities intended to provide high quality instruction to an entire class or school. Universal screening is part of the core instructional program provided to all students and not principally intended to address the needs of students without disabilities who require additional academic and behavioral support to succeed in a general education environment.

WHERE CAN I LEARN MORE?

- Coordinated Early Intervening Services - Resources Step by Step – CIFR: <https://cifr.wested.org/resources/ceis/ceis-step-by-step-factors/>
- Significant Disproportionality in Special Education – Fact Sheet Vol. 2 – CDE: http://www.cde.state.co.us/cdesped/factsheet_sigdispro_vol02
- Equity in IDEA - Regulation of 2016: <https://www.govinfo.gov/content/pkg/FR-2016-12-19/pdf/2016-30190.pdf> and OSEP's Essential Questions and Answers: http://www.cde.state.co.us/cdesped/faq_significantdisproportionality



Allowed



Not Allowed



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