

Racial Discipline Gap Program (RDGP) Q&A

Racial Discipline Gap Program timeline:*

11/16/2020	Final day to submit a data request to OSPI Student Information for processing before the application due date
02/04/2021	Application due in iGrants before 4pm
02/05-02/12/2021	Application review, interview, and district selection process
02/16/2021	RDGP grant award(s) announced
03/01–06/30/2021	Grant activities implementation
06/30/2021	Fiscal year ends

1. What are the allowable grant activities that a district may use RDGP funding for?

As state policymakers and districts work to address institutional racism by dismantling policies and practices that result in racially disproportionate outcomes,¹ this grant presents an opportunity to support ongoing statewide [implementation of student discipline policies and procedures](#) at the local level. The scope of grant activities focuses on student discipline provisions that apply to all school districts under WAC [392-400-110](#) and RCW [28A.415.410](#) involving family and community engagement, disaggregated data use, best practices for behavior, policies and procedures, and staff training.

Applicant districts must provide evidence regarding how RDGP funding and grant activities will address district needs in a manner that complements the use of existing funds (e.g. LAP, Title I, Part A, OSSI, IDEA², SCTG, Inclusionary Practices, etc.) to create systems, policies, and practices to address racial discipline gaps. Applicant districts also need to provide assurances regarding use of funds, activities, tribal consultation and collaboration, and regular meetings with OSPI to guide grant recipients in coordination with partner organizations. Refer to Form Package 992 in iGrants and the RDGP scoring rubric for detailed information regarding allowable grant activities.

* Timeline dates are tentative and may shift depending on COVID-19 developments and considerations.



2. Can any school district with racial discipline gaps apply for RDGP funding?

Yes. \$75,000 of state funds are available for fiscal year 2021 solely for grants to school districts to create systems, policies, and practices to address racial discipline gaps. Any local educational agency (LEA) that can demonstrate needs directly related to the grant activities is eligible to apply, including Tribal schools that function as an LEA.

Rather than predetermining award amounts, OSPI will select district(s) based on the completeness of application components, including budget request details, and the amount(s) rewarded will be contingent upon application review scores. Districts should only request the amount of funding that can be expended during the 2021 fiscal year from the time funds are made available in February 2021 until June 30, 2021.

3. Do school districts use disaggregated student race and ethnicity data to identify racial discipline gaps?

Yes. Student race and ethnicity data includes each of the federally mandated categories as well as further disaggregated race and ethnicity categories districts are required to collect under state law.³

Student race and ethnicity information that is collected using federal categories may not accurately reflect student self-identify or group membership. For example, although over 60,000 students in Washington are identified as *American Indian or Alaskan Native* (AI/AN), only around 15,000 are represented in the federal AI/AN reporting category—with the majority included in the *Hispanic/Latino* and *Two or More Races* categories due to federal classifications under the two-part question on race and ethnicity.⁴

Disaggregation of federal race and ethnicity categories may reveal hidden racial discipline gaps. For example, although in the aggregate Asian students experience low discipline rates in Washington, Southeast Asian student groups (e.g., Cambodian, Lao) experience higher discipline rates than East Asian student groups (e.g., Chinese, Taiwanese).⁵

Racial categories are established in specific socio-historical contexts and change over time so districts should seek to understand what diversity of racial meanings may exist within the community when addressing racial discipline gaps. Districts should use best practices for self-identification and observer identification outlined in the [Race and Ethnicity Student Data Guidance for Washington's Public Education System](#) and disaggregate broader racial categories to identify any within-group variation in school discipline experiences and outcomes of diverse student groups.



4. Do state laws require school districts to review disaggregated discipline data by race/ethnicity?

Yes. School districts are required to use disaggregated discipline data in accordance with Washington's student discipline laws and civil rights laws.

State discipline laws require school districts to use disaggregated discipline data, including by race/ethnicity, to monitor the impact of the district's discipline policies, procedures, and practices as well as to update the district's discipline policies and procedures to improve fairness and equity in the administration of discipline. See RCW [28A.320.211](#) and WAC [392-400-110\(2\)](#).

State civil rights laws require school districts to review disaggregated discipline data, including by race/ethnicity, to identify and address discrimination against students in protected classes identified in chapters [28A.640](#) and [28A.642](#) RCW. While the process districts adopt for using disaggregated discipline data under state discipline laws may also include reviewing data to prevent and address discrimination, districts must ensure they review disaggregated discipline data in accordance with WAC [392-190-048](#) at least annually.

For information regarding civil rights laws and discipline, refer to [Preventing and Addressing Discrimination in Student Discipline](#) and contact OSPI's [Office of Equity and Civil Rights](#).

5. Can districts view discipline data that is submitted to the state by race/ethnicity?

Yes. Districts may access discipline data submitted to CEDARS in a few different ways.

The [State Report Card](#) is publicly available and displays statewide out-of-school exclusion rates, including by race/ethnicity, at the state, district, and school levels. Publicly available discipline data may also be downloaded through OSPI's [Data Portal](#).

The secure Tableau data portal contains a discipline data dashboard as well as unsuppressed district Report Card data, available to authorized district staff through OSPI's Education Data System (EDS). The dashboard includes detailed district and school level data with visualizations and filters that allow district users to view and analyze their discipline data, including disaggregation and cross-tabulation by race/ethnicity. A district's [District Data Security Manager](#) (DDSM) controls access to the Tableau Server.

OSPI may also be able to process [Student Data Sharing](#) requests for any discipline data submitted to CEDARS that is not publicly available or in the secure Tableau data portal. Districts can email data requests to student.information@k12.wa.us



6. Do state policies require school districts to use a specific statistical method or measure for identifying racial discipline gaps?

No. Although state discipline laws require districts to review disaggregated discipline data by race and ethnicity, districts may use a variety of statistical methods or measures to identify racial discipline gaps based on the racial and ethnic composition of the district's student population and other local factors. OSPI will review a district's grant application as well as the district's discipline data submitted to CEDARS when evaluating evidence of racial discipline gaps.

Different quantitative measures have advantages and limitations and relying on a single measure can obscure or exaggerate disproportionality. Therefore, it is recommended that states and districts use multiple measures or methods to identify racial/ethnic disproportionality.⁶ Common statistical methods for assessing racial/ethnic disproportionality in discipline include *composition* metrics and *risk* metrics.⁷

Composition refers to the proportion of students in a category who are from a specific racial/ethnic group. Composition metrics are used to assess whether a discipline outcome for a specific racial/ethnic student group is proportional to that group's representation in the student population. For example, during the 2018–19 school year in Washington, Black students made up 4.5% of the student population but 10.6% of all out-of-school exclusions.⁸

Risk refers to the probability of an outcome occurring for a specific racial/ethnic student group. Risk metrics are used to assess the likelihood of a discipline outcome occurring for a specific racial/ethnic group in relation to a comparison group. For example, during the 2018–19 school year in Washington, the out-of-school exclusion rate for Native Hawaiian/Other Pacific Islander students was 6.4% compared to a rate of 3.9% for all other student groups.⁹

To gain a deeper understanding of the complexities of racial discipline gaps, qualitative methods (e.g. descriptive data collected through observations, conversations, surveys, etc.) must also be used.¹⁰ For more information about methods for identifying racial discipline gaps, refer to the following resources:

- IDEA Data Center: [Methods for Assessing Racial/Ethnic Disproportionality in Special Education](#)
- National Center on Safe Supportive Learning Environments: [Addressing the Root Causes of Disparities in School Discipline](#)
- National Positive Behavioral Interventions and Supports (PBIS) Technical Assistance Center: [Using Discipline Data within SWPBIS to Identify and Address Disproportionality: A Guide for District and School Teams](#)
- REL Northwest: [School Discipline Data Indicators: A Guide for Districts and Schools](#)



7. Are districts limited to identifying racial discipline gaps using only race and ethnicity student data?

No. Districts should review disaggregated and cross-tabulated data to identify racial discipline gaps that may occur within other student groups (e.g. gender, special education, section 504, low-income, homeless, English learner, etc.). Racial discipline gaps are not attributed to differences in student behavior or poverty. Rather, research consistently finds that race remains a significant predictor of the over-representation of Black students in exclusionary discipline outcomes when controlling for other variables.¹¹

Under the Individuals with Disabilities Education Act (IDEA), the state reviews data from districts to determine if significant disproportionality based on race or ethnicity is occurring in the area of discipline.¹² Therefore, consistent with existing policies and research, districts should seek to proactively address racially disproportionate discipline outcomes by gender, special education, foster care, migrant, and other student groups.¹³

8. Who are the partner organizations that OSPI is coordinating with to guide grant recipients?

OSPI will guide grant recipients working in coordination with the [South King County Discipline Coalition](#) (SKCDC), the [Washington Education Association](#) (WEA), the [Association of Washington School Principals](#) (AWSP), the [Washington Association of School Administrators](#) (WASA), and the [Washington State School Directors' Association](#) (WSSDA).

The SKCDC is a parent group that focuses on ending disproportionate discipline of students of color. While the coalition is regionally focused, the organization has partner networks across various regions of the state. SKCDC could serve as a conduit with partner networks to support meaningful parent and family engagement at the local level with grant recipients, whether within the King County region or other regions.

WEA represents certificated and classified staff across Washington. WEA members, leaders and staff work together to ensure equitable access to opportunities is a reality for all students. WEA values, actions, resources, funding, staff and governance are aligned to dismantle White Supremacy Culture and advance systems and structures of equity in opportunities and outcomes for all. WEA promotes student-centered schools that are culturally responsive in addressing student needs, eliminating policies that are barriers, and increasing student and family voice. WEA has a strong history of supporting equitable and inclusive classrooms. WEA is able to work directly with grant recipients to provide high-quality professional learning to support the elimination of racial disparity gaps in student discipline. These offerings include but are not limited to: Inclusionary Practices, High Leverage Practices, De-escalation practices,



Social-Emotional Learning, Understanding the State Discipline Rules, and Culturally Responsive Classroom Management.

AWSP represents school leaders across Washington. AWSP leads on diversity and equity issues for historically underserved populations and uses an equity lens to support principals and the principalship in the education of each and every student. AWSP could support grant recipients with professional learning opportunities and mentoring services that promote research and results-driven leadership strategies to meet the needs of diverse student populations.

WASA represents superintendents across Washington. WASA goals include cultivating equity-driven leaders by delivering professional learning that focuses on closing opportunity gaps, developing relationships that promote excellence in public education, and advocating for policy that ensures racial equity. WASA will continue to offer support for all superintendents and central office staff throughout Washington, including by partnering with grant recipients, to address racial discipline gaps.

WSSDA represents the 1,477 locally elected school board directors from across Washington with research-based leadership development resources, policy and legal guidance, and legislative advocacy. Equity is foundational to the work of WSSDA, and educational equity can only exist when a student's level of opportunity and achievement cannot be predicted based on race, characteristics, or circumstances. WSSDA could support grant recipients by providing model discipline policies and procedures that comply with state law and through professional development of board-superintendent teams focused on identifying and eliminating discriminatory discipline practices within the district.

9. How will OSPI determine which districts are selected and awarded RDGP funds?

Districts will be evaluated based on the completeness of the grant application and reviewers will use a scoring rubric to allocate points corresponding to each of the needs assessment and grant activities domains within the application. Based on the number of applications received as well as the amount of funds requested by applicant districts, OSPI will select districts with the highest scores to move forward. Districts selected for final consideration must participate in an interview with OSPI as part of the final selection determination process, which may include negotiation of award amounts. Districts who are offered an award amount may choose to accept or decline the RDGP funds.

10. Does the actual number and percentage enrollment of the student group(s) the district identified as experiencing racial discipline gaps influence whether a district will be selected or how much money will be awarded?

Yes. All competitive grant funding awarded by OSPI will be evaluated based in part on need related to identified racial discipline gaps. The actual number and percentage enrollment of



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student groups experiencing racial discipline gaps will be considered when deciding which district(s) to award grant money and how much. A district's application must include 2019–20 school year enrollment data for the identified student group(s). However, districts should review discipline data for multiple school years, including the current school year, when identifying student group(s) experiencing racial discipline gaps.

11. Are the district's family engagement activities supposed to include families of student groups experiencing racial discipline gaps?

Yes. A district's application must include information about how the district included the voices of students and families experiencing racial discipline gaps in the processes of identifying district needs and developing plans for the grant activities. Family engagement is a key component of RDGP grant activities so the thoroughness of a district's description of proposed engagement activities with families of student groups experiencing racial discipline gaps will be evaluated as part of the grantee selection process.

Refer to OSPI's GATE Equity webinar on [Family Engagement and Student Discipline](#) to learn about innovative approaches to family engagement, racial equity, and student discipline policies and practices. For additional resources, refer to OSPI's Title I, Part A [Guides & Resources for Parent & Family Engagement](#) webpage.

12. Does the district need to identify who will participate in the monthly meetings with OSPI?

Yes. A grantee district must identify who is responsible for managing the program and overseeing grant activities. Of the proposed project management team, at least one person with primary responsibilities or decision-making authority for the program must participate in the monthly meetings with OSPI. OSPI will coordinate with partner organizations to determine the appropriate level of participation from each organization in accordance with the grantee district's proposed plan and grant activities.

13. If a district already receives grant funding to support implementation of positive behavioral interventions and supports or professional learning and other activities related to discipline, would the district be considered for selection?

Yes. Each applicant district must identify specific funding needs and provide information about how the proposed program would complement already existing district activities. A district's application should clearly document demonstrated needs as well as demonstrated readiness to benefit. Information the district provides regarding the use of current funding sources and existing activities will be considered when deciding which district(s) to award grant money and how much from the \$75,000 funds.



14. Can districts access and use OSPI's existing discipline training program materials?

Yes. Districts are encouraged to access the discipline training program materials developed in accordance with RCW [28A.415.410](#) through OSPI's [Student Discipline Training](#) webpage. The discipline training content highlights the connection between research, policies, data, and best practices in school discipline. Existing content will continue to be enhanced and additional content will be added over time. OSPI and partner organizations will guide grant recipients using existing training materials and resources, which may be modified and adapted as necessary for the district's use.

15. Is there flexibility in determining how RDGP funds will be used to provide discipline training opportunities for district staff?

Yes. Districts can decide to use all, some, or none of the requested RDGP funds for discipline training opportunities as long as the district's application identifies how the training will be provided and with what source of existing funds or with what amount of requested funds.

Districts have flexibility in determining whether the training is in person or online, for all staff or few, and team-oriented or self-directed. To the fullest extent possible, districts are strongly encouraged to plan team learning and engage staff in collaborative, job-embedded learning that builds staff capacity and collective efficacy. While RDGP funds may only be used for limited training opportunities, the grant narrative should address how the district will ensure all staff are knowledgeable of the district's discipline policies and procedures.¹⁴

16. Can a district use existing federal or state funds to support the activities within the scope of the grant, even if the district does not apply for or receive RDGP funds?

Yes. Districts can use various federal and state funds to support activities related to student discipline provisions under WAC [392-400-110](#) and RCW [28A.415.410](#) involving family and community engagement, disaggregated data use, best practices for behavior, policies and procedures, and staff training. For example, districts could potentially use Title I, Part A federal funds and Learning Assistance Program (LAP) state funds for family engagement activities, discipline data coaching, behavior services, positive school climate efforts, and professional learning opportunities. A variety of additional federal and state funds, such as Title II, Part A funds or Transitional Bilingual Instruction Program (TBIP) funds, may be used to support certain activities within the scope of the grant.

The [Every Student Succeeds Act](#) (ESSA) requires a district's plan for receiving Title I, Part A funds to describe how the district will support efforts to reduce the overuse of discipline practices that remove students from the classroom, which may include identifying and supporting schools with high rates of discipline, disaggregated by student groups to include



low-income, race/ethnicity, students with disabilities, and English language learners.¹⁵ Under Section 8538 of ESSA, districts with an enrollment where American Indian or Alaska Native students are 50 percent or more of total enrollment or that received a grant under subpart 1 of part A of Title VI that exceeded \$40,000 for the 2018-2019 fiscal year are required to complete tribal consultation on issues affecting American Indian and Alaska Native students.

Under state law districts are required to implement best practices and strategies in OSPI's [Menus of Best Practices and Strategies](#) as a condition for expending LAP funds,¹⁶ and district discipline policies and procedures must identify *other forms of discipline* staff should administer before or instead of exclusionary discipline to support students in meeting behavioral expectations—which may include best practices and strategies in OSPI's [Behavior Menu of Best Practices and Strategies](#).¹⁷

Under IDEA regulations, districts may use up to fifteen percent of IDEA Part B funds to implement voluntary coordinated early intervening services (CEIS). Voluntary CEIS activities may include professional learning and behavioral interventions that proactively address racial discipline gaps.

For additional information regarding various use of federal and state funds, refer to OSPI's [Unlocking Federal and State Program Funds to Support Student Success](#). For technical assistance, email Title1a@k12.wa.us or LAP@k12.wa.us or call 360-725-6100.

For additional information regarding IDEA use of funds, refer to Center for IDEA Fiscal Reporting & IDEA Data Center [Quick reference guide on coordinated early intervening services](#). For technical assistance, contact OSPI's Special Education department at speced@k12.wa.us or 360-664-3631.



¹ Refer to Sec. 1 of [4SHB 1541](#), Educational Opportunity Gap Oversight and Accountability Committee (EOGOAC) [Publications and Reports](#), WAC [392-400-010](#), and OSPI's [Vision, Mission, Values, and Equity Statement](#).

² If the LEA is required to set aside 15 percent of IDEA Part B funds due to a designation of significant disproportionality in the area of discipline under WAC [392-172A-07040](#), the LEA must summarize the activities in the comprehensive coordinated early intervening services (CCEIS), including any revisions made to the district's discipline policies, procedures, and practices. Refer to OSPI's [Significant Disproportionality](#) webpage for more information.

³ See Appendix Y – Ethnicity Codes and Appendix Z – Race Codes of [OSPI CEDARS Data Manual Appendices For the 2020-2021 School Year](#).

⁴ OSPI Report to the Legislature (2019). [Update: The State of Native Education](#).

⁵ See Nguyen, B. M. D., Noguera, P., Adkins, N., & Teranishi, R. T. (2019). [Ethnic Discipline Gap: Unseen Dimensions of Racial Disproportionality in School Discipline](#). *American Educational Research Journal*, 56, 1973-2003.

⁶ See Bollmer, J. M., Bethel, J. W., Munk, T. E., & Bitterman, A. R. (2014). [Methods for Assessing Racial/Ethnic Disproportionality in Special Education: A Technical Assistance Guide \(Revised\)](#). IDEA Data Center.

⁷ See McIntosh, K., Barnes, A., Eliason, B., & Morris, K. (2014). [Using discipline data within SWPBIS to identify and address disproportionality: A guide for school teams](#). OSEP Technical Assistance Center on Positive Behavioral Interventions and Supports.; Nishioka, V., Shigeoka, S., & Lolic, E.. (2017). [School discipline data indicators: A guide for districts and schools](#) (REL 2017–240). Washington, DC: U.S. Department of Education, Institute of Education Sciences, National Center for Education Evaluation and Regional Assistance, Regional Educational Laboratory Northwest.

⁸ OSPI Student Information, data extracted on 5/12/2020. Note, *all out-of-school exclusions* refers to the total number of short-term suspensions, long-term suspensions, expulsions, and emergency expulsions.

⁹ OSPI Student Information, data extracted on 5/12/2020. Note, *out-of-school exclusion rate* refers to the percentage of students (unduplicated counts) within a student group who received at least one short-term suspension, long-term suspension, expulsion, or emergency expulsion during the school year.

¹⁰ Skiba, R. J., Arredondo, M. I., & Rausch, M. K. (2014). New and developing research on disparities in discipline. *Bloomington, IN: The Equity Project at Indiana University*.

¹¹ See Fabelo, T., Thompson, M. D., Plotkin, M., Carmichael, D., Marchbanks, M. P., & Booth, E. A. (2011). [Breaking schools' rules: A statewide study of how school discipline relates to students' success and juvenile justice involvement](#). *Council of State Governments Justice Center*.; Huang, F.L. (2016). Do Black students misbehave more? Investigating the differential involvement hypothesis and out-of-school suspensions. *The Journal of Educational Research*, 1-11.; Nowicki, J. M. (2018). [K-12 Education: Discipline Disparities for Black Students, Boys, and Students with Disabilities](#). Report to Congressional Requesters.

GAO-18-258. *US Government Accountability Office*.; Skiba, R. J., & Williams, N. T. (2014). Are Black kids worse? Myths and facts about racial differences in behavior. *The Equity Project at Indiana University*, 1-8.

¹² See OSPI's [Significant Disproportionality](#) webpage for more information.

¹³ See Morris, E. W., & Perry, B. L. (2017). Girls behaving badly? Race, gender, and subjective evaluation in the discipline of African American girls. *Sociology of education*, 90, 127-148.

¹⁴ WAC [392-400-110](#)(3)

¹⁵ ESSA Sec. 1112(b)(11)

¹⁶ RCW [28A.165.035](#)

¹⁷ WAC [392-400-110](#)(1)(e)



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