



Guidance

B-Valid & Reliable Corrective Action Plan (CAP) for B-13 Data

Michigan Department of Education Office of Special Education
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What is a B-Valid & Reliable Corrective Action Plan?

B-Valid & reliable (B-VR) refers to the accuracy and consistency of the submission of Part B data. B-VR specific to indicator B-12 (Early Childhood Transition) can be found in the guidance document, "[B Valid and Reliable Corrective Action Plan \(CAP\) Verification Activity for B-12 Data](#)". The purpose of this document is to provide guidance specific to B-VR CAPs related to indicator B-13 (Secondary Transition).

B-VR specific to indicator B-13 refers to the accuracy and consistency of the submission of secondary transition data for transition aged students with an Individual Education Program (IEP). At minimum, a student is considered to be transition aged no later than the first IEP to be in effect when the student turns 16, or younger if determined appropriate by the IEP team.

Specifically, if the responses on one or more of the following B-13 Checklist items completed by the member district (MD), intermediate school district (ISD), and Michigan Department of Education Office of Special Education (MDE OSE) do not match with 100% accuracy, the ISD will receive a B-VR-CAP. The following are the items used to determine compliance for indicator B-13:

- Was the student invited to the IEP Team meeting where transition services were discussed? 34 CFR §300.321(b).
- Was there prior written consent of the parent or student, who has reached the age of majority, to invite an agency? 34 CFR §§300.9 and 300.321(b)(3).
- Was a representative of any participating agency likely to be responsible for providing or paying for transition services invited prior to the IEP Team meeting? 34 CFR §300.321(b)(3).

- Were the postsecondary goals based on age-appropriate transition assessment? 34 CFR §300.320(b)(1).
- Did the IEP include a measurable postsecondary goal? 34 CFR §300.320(b)(1)
- Were the postsecondary goals updated annually? 34 CFR §300.320(b)
- Did the IEP include transition services to reasonably enable the student to meet their postsecondary goals? 34 CFR §§300.43 and 300.320(b)(2).
- Did the IEP include courses of study to reasonably enable the student to meet their postsecondary goals?
- Were there annual IEP goals related to the student's transition service needs?

Completing the CAP Activity Form

There will be required corrective action(s) that must be included as activities for the B-VR-CAP listed on the CAP Activity form under question two, “Required Corrective Action”. The ISD can add additional activities to the CAP as well if they determine activities outside of the required corrective actions are needed to correct the identified noncompliance and prevent future noncompliance related to the CAP.

One required corrective action may be: "The ISD Transition Coordinator (TC) will be required to attend a B-13 Secondary Transition Interrater Reliability Training." On the CAP Activity form, the ISD will identify the personnel who will attend the required training session and select the desired training date(s). In addition to the required TC, the ISD may select other relevant employees to attend this training session.

Newly revised or developed written procedures to address the root cause of the items of noncompliance are required. Written procedures must include clear instructions regarding how the MD/ISD collect and verify secondary transition data.

Requesting Verification and Closeout of the CAP

To complete verification of correction for the CAP, the ISD and MDE OSE must verify:

- All CAP activities have been completed.
- The MDs’ data indicate 100 percent compliance including students’ records and the B-13 Checklist.

- There are three forms that must be completed prior to requesting verification and closeout of the CAP; Request for Verification & Closeout, CAP Verification, and CAP Assurance Statement form. Each individual form provides detailed directions on how to complete the required sections prior to submitting to MDE OSE under the section entitled “Instructions”.

The CAP Verification and Verification Assurance Statement form cannot be completed until the B-13 Data Collection activity is available in Catamaran. Once the ISD submits the CAP for verification and closeout, MDE OSE may provide a list of MDs, student names, and information to be uploaded for each MD on the CAP Verification form. To complete this section, upload the information requested using the browse button on each row.

When completing the Indicator B-13 Verification Activity for a B-VR-CAP, the ISD, in collaboration with the MDs, must do the following:

- Review the list of MDs and specific information provided by MDE OSE. Information requested will likely include transition aged students’ most recent IEP, IEP meeting invitation, as well as consent for outside agency form (if applicable).
- Use the [B-13 checklist](#) to verify all records meet 100 percent compliance per 34 CFR §300.43.
- Upload the requested information for each MD to the CAP Verifications form.
- Submit the CAP to MDE OSE for verification and closeout.

This activity must be completed by a TC or Transition Coordinator Contact (TCC). Catamaran Coordinators and the responsible party at the ISD will be able to view the B-13 Data Collection activity but will not be able to complete it. For more information, review [“How to Complete the B-13 Data Collection”](#).

If student records are available but:

- Noncompliance is found, such as an item is marked “No” on the B-13 checklist, the student’s IEP must be revised before requesting verification and closeout.

- There are inconsistent responses between the MD and the ISD identified during CAP verification, the MD and the ISD must collaborate to determine and verify the accurate response.
- There are continued findings of noncompliance, then there may be additional CAP activities assigned before the CAP can be closed.

If no student records are available, the ISD must:

- Conduct interviews with relevant staff members.
- Provide a summary of the content of those interviews and whether the interviewee demonstrated an understanding of compliant procedures and practices.
- Enter additional notes as needed to document the verification process.

TA Notes

For each CAP issued in Catamaran Workbook, MDE OSE has provided a TA Notes form available on each CAP menu. The purpose is to keep a comprehensive record of the technical assistance provided to the MD and the ISD.

MDE OSE requests that the TA Notes form be kept up to date by the TA provider. The TA provider uses this form to document all contact with the district including CAP development, progress report notes, and updates on the activities of the CAP. Note, MDs cannot view or access the TA Notes form; only the assigned TA Provider, ISD, or MDE OSE may view and edit the TA Notes.

Resources

[Compliance Checklist for Secondary Transition with TA Column](#)

[How to Complete the B-13 Data Collection](#)

[Individuals with Disabilities Education Act \(IDEA\)](#)

[Inviting Participating Agencies Clarification](#)

[Michigan Student Data System \(MSDS\) Collection Data Manual](#)

[Secondary Resources](#)

[TA Notes](#)

[Q&A From B-13 Data Collection Webinar](#)