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AUTHOR Ahearn, Eileen M.
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ABSTRACT

Current policies and procedures used by states to oversee implementation of the Individuals with Disabilities Education Act (IDEA) are reviewed, based on a 1994 survey called Profiles of State Monitoring Systems, with data from 49 states and 9 of the 10 federal jurisdictions subject to the requirements of IDEA. Background information is provided on federal and state monitoring systems for IDEA. State-level data are provided on IDEA child counts and the number of agencies monitored, including state agencies, local education agencies (LEAs), intermediate education units, and private programs or service providers. Information is also presented on: state monitoring cycles, LEA self-monitoring, monitoring of program effectiveness and student outcomes, the composition of monitoring teams, and sanctions for noncompliance. Brief profiles of monitoring systems in Arizona, California, New Jersey, and Texas are presented. Changes in monitoring by the Office of Special Education Programs for the 1994-95 school year are summarized. Appendices provide the survey instrument and a chart of selected survey results. (Contains 6 references.) (SW)

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STATE COMPLIANCE MONITORING PRACTICES:

AN UPDATE

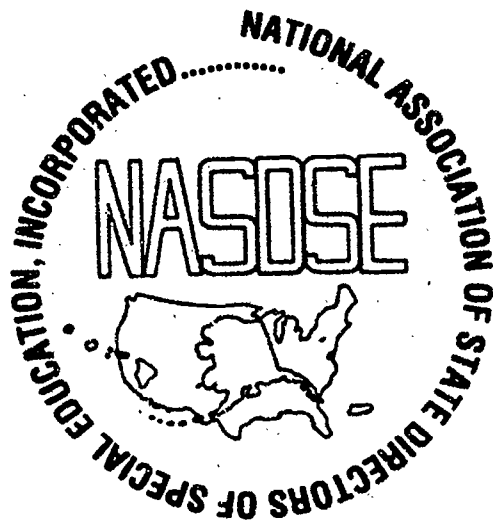
by Eileen M. Ahearn, Ph.D.

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National Association of State Directors of Special Education
1800 Diagonal Road, Suite 320
Alexandria, VA 22314

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Kay Lund, Arizona State Director

Barbara Gantwerk, New Jersey State Director

Jill Gray, Texas State Director

Jim Leinen, Western Regional Resource Center

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FOREWORD

This report is the result of a study done under Project FORUM, a contract funded by the Office of Special Education Programs (OSEP) of the U. S. Department of Education and located at the National Association of State Directors of Special Education (NASDSE). Project FORUM carries out a variety of activities that provide information needed for program improvement, and promote the utilization of research data and other information for improving outcomes for students with disabilities. The project also provides technical assistance and information on emerging issues, and convenes small work groups to gather expert input, obtain feedback, and develop conceptual frameworks related to critical topics in special education.

The purpose of this analysis is to update and add to the information contained in a 1992 Project FORUM analysis of the results of a 1992 survey on state practices in compliance monitoring that also contained input from the Second National Conference on Monitoring held that year. A Third National Conference on Monitoring was held in November, 1994, and it involved the distribution of the results of another survey on state monitoring policies and practices that had been conducted by the Regional Resource Centers. This activity was included in Project FORUM's tasks for the 1994-95 year to provide State Directors of Special Education and others with important and timely information on this critical issue and especially to inform the debate that will be occasioned by the pending reauthorization of the Individuals With Disabilities Education Act.

ABSTRACT

This report contains an analysis of data gathered at the Third National Monitoring Conference held in November, 1994. It is an update and expansion of information contained in a similar report completed as a Project FORUM activity in 1992 in connection with the prior monitoring conference.

The report includes information provided at the conference in the form of a background document entitled *Profiles of State Monitoring Systems 1994*. Its contents were analyzed and, in some instances, discussed with state personnel. Other material was obtained from documents distributed at the conference and/or discussions with conference participants.

The background section includes a description of federal and state monitoring systems and a discussion of child count and the number of entities each state must monitor. A discussion of the characteristics of state monitoring systems includes descriptions of monitoring cycles, LEA self-monitoring, monitoring beyond federal requirements, the composition of monitoring teams, and sanctions for non-compliance. The data presentation concludes with profiles of the monitoring systems in four states. The report concludes with a brief discussion and conclusion section and a list of references. Appendices contain a copy of the survey form used by the Regional Resource Centers in obtaining data for the *Profiles* document, and a chart of state responses to the survey.

STATE MONITORING PRACTICES: AN UPDATE

INTRODUCTION

The pending reauthorization of the discretionary programs of the Individuals With Disabilities Education Act (IDEA) has focused interest on the implementation of the act over the past twenty years. This analysis is intended to provide an overview of current policies and procedures that states use to oversee that implementation in their local school districts.

In December, 1992, Project FORUM issued a report entitled *Analysis of State Compliance Monitoring Practices* in which the information gathered at the 1992 National Conference on Monitoring and the results of a survey of state monitoring practices completed in that year by the Regional Resource Centers (RRCs) were analyzed and discussed. In November, 1994, the RRCs convened the Third National Conference on Monitoring and once again surveyed state monitoring practices. This document is an update of the earlier report on state monitoring practices and is based on data from the more recent conference and survey. (Appendix A contains a copy of the survey form; a chart of survey results on selected items is included as Appendix B.)

This report consists of a brief background on the law and its requirements for monitoring, some child count statistics, and a description of specific monitoring practices in the states including the following: use of the self-study as part of the process, the composition of onsite visiting teams, cycles of review, the incorporation of measures of effectiveness and outcomes into the monitoring process, and other changes adopted recently by states. Also included is a brief profile of the unique aspects of four state monitoring systems. The report concludes with a discussion of current trends and proposals to improve monitoring practices at both state and federal levels.

BACKGROUND

Federal and State Monitoring Systems

The passage of P.L. 94-142 (Education of the Handicapped Act, since renamed the Individuals with Disabilities Education Act or IDEA) in November, 1975 marked the beginning of a far-reaching change in the interaction between State Departments of Education and the Local Education Agencies (LEA) or Intermediate Education Units (IEU) that deliver direct services to students with disabilities within the state. The law granted federal funds for providing special education services to students with disabilities and mandated new responsibilities for States to monitor how localities provide those services. Specific sections of IDEA and the regulations implementing it, as well as requirements in the Education Department General Administrative Regulations (EDGAR), contain responsibilities for Federal oversight, but §1412 of the Act contains the general provisions that authorize State monitoring of the provision of education to students with disabilities:

The State educational agency shall be responsible for assuring that the requirements of this subchapter are carried out and that all educational programs for children with disabilities within the State, including all such programs administered by any other State or local agency, will be under the general supervision of the persons responsible for educational programs for children with disabilities in the State educational agency and shall meet education standards of the State educational agency. [20 U.S.C. 1412(6)]

Since 1975, both the U.S. Department of Education and State Departments of Education have developed monitoring systems to assess compliance with applicable statutes and regulations pertaining to programs and services for students with disabilities. Originally termed the Program Administrative Review and now referred to as a multi-faceted program review process, the series of activities used by the Office of Special Education Programs, Division of Assistance to States (OSEP/DAS) to determine the extent to which a State is in compliance with IDEA and related requirements includes an examination of documents (State Plan, annual performance reports, policies, etc.) and an onsite verification of implementation.

As described in the *Sixteenth Annual Report to Congress* (U.S. Department of Education, 1994, p. 173), monitoring procedures used by OSEP to evaluate each state's implementation of IDEA have evolved as a result of changes in the law and modifications in the strategies states use to meet their responsibilities under the law. Since their inception, however, monitoring procedures have involved both a documentation review and a visit to the state by a team of OSEP staff. Currently, OSEP staff carry out a pre-visit set of activities that include one or more public meetings held in the State and preparation for the onsite visit. During their week-long presence in the State, OSEP staff review state documents and interview state officials, visit selected schools and other public agencies, review IEPs and interview personnel responsible for programs for students with disabilities. As a part of each compliance review, OSEP assesses the state's procedures for monitoring local education agencies and intermediate education units. The entire process results in a written report that cites non-compliance and a corrective action plan to bring state policies and procedures back into conformity with federal requirements.

In the past, a draft of the monitoring report compiled by OSEP was submitted only to the SEA for review with an opportunity for comment on its contents before it was made public. This was first changed on April 28, 1994 when OSEP announced that it would henceforth make the Draft Monitoring Report available to the public in response to a FOIA request at the same time that it is released to the state. However, with the issuance of OSEP Memorandum #95-3 (see page 21 for a summary of this document announcing some changes in monitoring procedures), this point became moot since OSEP will no longer be issuing draft reports.

OSEP requires that states include in their monitoring system the procedures necessary to determine their LEA's compliance with every state and federal requirement. Although there are variations among state monitoring systems, they have all developed a structure similar to the

federal approach. Some states add special components or vary the procedures as will be discussed below. However, in general, the monitoring process in states includes a review of records such as the LEA and/or IEU funding applications, complaint investigations, self studies, child counts and other data, some type of onsite verification of the implementation of policies and procedures, and the prescription of a correction process for any identified deficiencies.

Factors Affecting State Monitoring Systems

The design of monitoring procedures in a state is influenced by a number of factors including the size and geography of the state, the administrative structure, the number of school districts, the number of other entities that must be monitored, and the number of students with disabilities who receive special education. The RRC survey that will be discussed in detail throughout this report included items that captured some of these factors, and a summary of those data is included here to provide a basic context for the description of state monitoring systems.

Child Count: The total number of children found eligible and served by each state under its special education programs and services is collected in each state as of December 1st of each year.¹ The distribution of federal funds under IDEA is based on that child count. This number has increased every year since the implementation of IDEA. It is subject to audit and is often revised. However, in order to provide a general frame of reference for the size of state programs and the support provided by the federal government, the child count used for official notifications of funding issued by OSEP for the 12/1/91 and the 12/1/93 were reviewed and compared. The official 12/1/93 total for each state is included in the survey data chart in Appendix B.

The IDEA child count increased by 362,205 between 12/1/91 and 12/1/93. The totals were 4,682,604 in 1991, and 5,044,809 in 1993 representing a 7.74 percent increase over that two year interval. Only three states registered a decrease during that period—Vermont (9.2%), Pennsylvania (1.8%), and West Virginia (0.4%), while three others—Alabama, Kentucky and North Dakota—had increases of less than one percent. The highest increase occurred in Nevada (23.4%), and the next highest set of increases ranging from 13 to 14 percent were in Georgia, Arizona, Alaska, Louisiana, New Mexico and New York.

Entities Monitored: Because the IDEA makes the state education agency (SEA) responsible for delivering a free appropriate education to students with disabilities, the SEA must have a plan to monitor the compliance of all providers with federal and state law and regulations, including school districts and others. The number of entities monitored refers to LEAs (local education agencies or school districts), IEUs (intermediate education units), other state entities (such as institutions maintained by other state agencies), and private programs or service providers. The child count and entities in each state are indicated in Table 1.

¹Each state also counted and received separate funds for children served under the "State Operated Programs" section of Chapter 1 of the Elementary and Secondary Education Act until 1994 when the funds available under that law were transferred into IDEA and those children were then included in the IDEA count.

Table 1
Child Count and Number of Units to be Monitored - 1993-94

STATE	TOTAL CHILD COUNT 12/1/93	LEAs	IEUs	OTHER STATE UNITS	PRIVATE UNITS	TOTAL UNITS
AL	99,884	130	0	6	28	164
AK	18,006	54	1	1	0	56
AR	53,251	107	0	3	35	145
AZ	69,530	215	0	6	0	221
CA	553,930	1,150	0	18	0	1,168
CO	66,595	36	14	12	60	50
CT	75,846	166	0	0	54	220
DE	15,196	16	0	3	0	19
FL	289,539	67	0	37	0	104
GA	123,143	184	0	43	12	239
HI	15,248	1	0	0	0	1
IA	63,400	390	15	3	5	413
ID	23,536	113	5	10	0	128
IL	257,986	0	96	3	0	99
IN	127,961	65	0	80	0	145
KS	50,441	304	41	14	11	370
KY	80,539	176	0	2	0	178
LA	86,931	66	4	3	0	73
MD	97,998	24	0	5	0	29
MA	160,275	354	0	0	150	504
ME	29,350	161	15	2	0	178
MI	181,251	536	57	5	0	598
MN	90,918	400	47	5	2	454
MS	64,153	153	0	10	17	180
MO	114,008	536	0	5	56	597
MT	18,771	235	0	0	0	235
NC	136,513	120	0	0	0	120
ND	12,440	0	31	3	3	37
NE	37,112	692	0	6	450	1,148

STATE	TOTAL CHILD COUNT 12/1/93	LEAs	IEUs	OTHER STATE UNITS	PRIVATE UNITS	TOTAL UNITS
NM	43,474	89	0	9	0	98
NV	25,242	17	0	1	0	18
NH	23,404	176	3	2	30	211
NJ	190,337	585	0	125	137	847
NY	365,697	714	38	29	113	894
OH	219,875	612	88	89	0	789
OK	73,131	554	0	3	0	557
OR	63,212	269	0	128	0	397
PA	210,826	501	0	0	0	501
RI	23,605	36	0	2	25	63
SC	81,930	91	0	23	0	114
SD	15,907	178	4	5	24	211
TN	119,146	139	0	35	47	221
TX	411,917	1,048	20	2	30	1,100
UT	51,950	40	0	2	4	46
VT	10,828	60	0	3	18	81
VA	135,060	136	0	52	58	246
WA	101,254	296	0	30	0	326
WV	44,538	55	0	9	0	64
WY	12,480	49	1	7	6	63

JURISDICTIONS:

AS	416	1	0	0	0	1
BIA	NA	23	0	0	0	23
CNMI	219	1	0	0	0	1
DC	7,009	1	0	2	57	60
FSM	5,380	4	0	0	0	4
GU	1,568	1	0	0	0	1
RMI	300	1	0	0	0	1
ROP	NA	1	0	0	0	1
VI	1,501	2	1	0	0	3

This listing of child count and entities to be monitored communicates some indication of the size of a state's monitoring job, but there are differences among states that must be noted in connection with these demographic data. In some states such as Illinois and Michigan, the monitoring of LEAs is organized through intermediate units and visits are planned on the basis of the cluster of districts that are part of each unit. The monitoring of private schools also differs: either they are monitored separately, or they are included as a part of the LEA or IEU in which they are located, or they are under the control and oversight of other state agencies.

CHARACTERISTICS OF STATE MONITORING SYSTEMS

A copy of the survey instrument, *Profile of State Monitoring Systems*, used by the Regional Resource Centers to gather information for the 1994 National Monitoring Conference, is contained in Appendix A. It included the same items as the 1992 survey with some added level of detail such as the breaking out of the total entities to be monitored into categories, and the addition of five new items: two about Part H, two about monitoring beyond requirements to include program effectiveness and student outcomes, and one on interagency agreements.

Responses were received from 49 states and nine of the 10 federal jurisdictions that are subject to the requirements of IDEA. The Wisconsin SEA could not respond to the survey because their monitoring system was undergoing a complete revision and decisions had not yet been finalized on many of the areas covered by the items.

It was not possible to analyze data reported for the three items that pertained to SEA staffing. It was learned through phone contacts with SEA personnel that SEA structure and staff responsibilities posed problems for those who responded, thus yielding what appeared to be discrepancies in the reported data. A variety of factors were found to have influenced responses to the staffing items. In many states, staff have assignments that cover more than one program area, so it is difficult to isolate the exact amount of time that is spent on monitoring. This differentiation is made even more difficult by the variations in what is defined by each state as part of the monitoring process and who is defined as a state employee. Several states involve individuals designated as "consultants" who may or may not be state employees. In some states, those who handle complaints are considered part of the monitoring staff, while in others this is a separate function. In addition, many SEAs see an overlap between monitoring and technical assistance for their LEAs and feel that there should not be a hard line drawn between these two functions. Given this lack of consistency in definition, no attempt was made to draw any conclusions from the staffing data.

Although there is much general similarity between state and federal monitoring systems, there are differences in the specific components that each state chooses to include in its system. The variations that were discussed in the first report in 1992 included the composition of onsite monitoring teams, the use of focused/targeted monitoring, monitoring beyond federal requirements, and some other specific aspects of the monitoring process in states. The next section of this report covers issues related to two characteristics of monitoring systems that were not discussed in detail in the previous report—monitoring cycles and LEA self-monitoring—followed by data related to the revised items on monitoring beyond federal requirements. A brief update on some of the other characteristics of state monitoring systems discussed in the previous report is also included.

Monitoring Cycles

States usually divide the entities to be monitored into groups determined by the monitoring cycle which can be defined as the number of years between onsite visits that the state has adopted for its monitoring program. The average length of state cycles is 4.6 years and they range from a low of two years in Alabama, to a high of eight years in Ohio.

There are almost as many patterns for monitoring as there are states. Some states have designed a schedule of different activities related to monitoring that take place in each year of the cycle. The Colorado system is an example of this annually structured approach:

- Year 1: LEA child count audit through a record review to check compliance with eligibility data and federal count reports;
- Year 2: LEA submits a comprehensive plan by the LEA, and SEA reviews data collected on the LEA concerning complaints, hearings, and other matters;
- Year 3: Comprehensive onsite visit to check compliance, determine local needs and provide technical assistance regarding program quality and effectiveness;
- Year 4: Follow-up technical assistance by SEA for areas identified as corrective actions and compliance concerns during the onsite visit; and,
- Year 5: Targeted onsite visitation to assure that the LEA has completed all corrective actions.

Some states have a variety of the multi-year schedule or another time design based on the various components of the monitoring system, while others concentrate most of their monitoring activity relative to each LEA into the year in which the district will be visited. However, even in states with the single year focus, follow-up to a corrective action plan and

verification of the corrections usually extend beyond the year of the onsite visit. Many states describe monitoring as an ongoing, continuous activity.

A total of fourteen states reported changes in their monitoring cycles since the 1992 report. As Table 2 indicates, 12 states increased the number of years, while only two made their cycles shorter.

Table 2
Changes in Number of Years in
State Monitoring Cycle

STATE	1992	1994
AL	5	2
AZ	6	5
CA	3	4
CT	4	5
ID	3	5
IL	5	6
KY	5	6
LA	3	4
MD	3	4
NE	3	5
NY	5	7
OH	3	8
OK	3	4
WY	3	5

Shaded rows = decreased cycles

LEA Self-Monitoring

According to survey responses, 25 out of the 49 responding states include self-monitoring by LEAs as part of their process. For some, it is a voluntary component of the process, but for others—or in certain circumstances—it is mandatory. Some states include a type of self-review within the LEA application for federal funding or in a mandated program plan that each LEA must submit to the state. However, states that include a self-

study in the monitoring process consider it a separate element and provide specific forms or directions for the LEA to use in preparing its content. A completed self-review is always an integral part of the state's monitoring of the district.

The California Coordinated Compliance Review that monitors all specially funded educational programs including, in addition to special education, Chapter 1, vocational education, adult education gender equity programs and other school-based coordinated programs, is an example of a voluntary self-review as a monitoring component. According to state training materials, the purposes of the self-review are to have the LEA take responsibility for reviewing specially funded programs for compliance, take corrective action prior to state validation review, and identify areas in which assistance is needed from the Department (California Department of Education, 1994). The benefits mentioned as derived from the self-review since its initiation in the mid-80s include:

- The LEA gains an opportunity to correct identified non-compliance problems prior to the state validation review;
- The state validation review process is shorter when the local entity completes a self-review;
- LEA staff and community gain a better understanding of state and federal requirements; and,
- LEA staff and community feel better prepared and less anxious about the state validation review.

Self-evaluation is a required part of the Florida monitoring system: the LEA must undertake a review of critical components of their special education program. Work papers are provided to the LEA, which must "self-evaluate" at least one student record for each program area. The names of the students whose records are to be self-monitored are selected by the state, and the LEA must provide a summary of their findings from each file. The LEA's "Report of Self-Evaluation" is included as a part of the state's monitoring report.

A full year of self-study is part of the Kentucky monitoring system. The state provides training to encourage districts to spend an entire year evaluating their programs and completing the self-study that must be submitted by May 1st. The site visit takes place in the following school year, and the same instrument is used by the state to verify LEA compliance.

Monitoring Beyond Federal Requirements: Program Effectiveness and Student Outcomes as Part of the Monitoring Process

The 1992 RRC survey item that asked states if their monitoring went "beyond legal obligations" was expanded in the 1994 survey to two items that asked if the state went beyond legal obligations in the areas of program quality/effectiveness, and student outcomes/results. While 19 of the 49 responding states indicated that they included program quality or effectiveness, only five said that they incorporate consideration of student outcomes/results in their monitoring process.

Some of the 19 states that responded positively to the item concerning *program effectiveness* as a part of their monitoring system provided brief details in the narrative component of the RRC Survey Report. For example:

- Idaho describes the major activity in year three of the monitoring process as an exemplary programs/effectiveness review that involves an onsite visit by personnel from other LEAs to verify the district's application for recognition.
- Nevada also includes a program effectiveness review as a required part of its monitoring system, suggesting that districts use a stakeholder model. Although Nevada districts can choose to use a model that differs from the one recommended by the state, they must submit a report of their program effectiveness activities to the SEA every three years.
- Louisiana also includes a quality indicators component as a part of the self-study process, but completion of this document is voluntary for LEAs.
- Michigan has piloted a set of quality indicators based on monitoring standards at the request of one of its intermediate school districts. The process is being refined and will be incorporated as an optional component of the Michigan system.
- Alabama noted that, when SEA staff identify a promising practice, the LEA is requested to prepare a summary that can be shared with other districts—a component of the review system known as "PSST or Practices Supporting Successful Teaching."

The five states that responded affirmatively to the item concerning *student outcomes* were California, Idaho, Maine, Texas and Vermont. Details about these items for California and Texas are contained in the next section that profiles distinctive monitoring systems in a few selected states. The other states are all in the process of trial implementation of various strategies to add this aspect to the monitoring process. For example, in four supervisory unions monitored in the 1993-94 school year, Vermont piloted a student outcomes component, and this segment will be added to three additional monitoring visits in the 1994-95 cycle.

Maine responded affirmatively to this item even though they do not gather specific data on outcomes as a part of monitoring. The SEA staff feel that the major purpose of

monitoring, especially the examination of IFPs, addresses outcomes issues. Although it is not officially a part of their process, Maine's monitoring staff advised that they do discuss issues relative to the completion of goals, movement to less restrictive placements, and other types of outcomes information on monitoring visits to districts.

Composition of Monitoring Teams

Although States are not compelled by Federal statute or regulations to make formal compliance visits to LEAs or IEUs, the actual implementation of policies must be verified. As mentioned above, states have generally adopted a monitoring system similar to the federal process and that includes an onsite visit to verify the implementation of federal and state policies. Every state uses at least one representative of the SEA on each team, but the teams in 16 states are composed exclusively of SEA personnel. Aside from SEA staff, states use staff from other school districts such as special education administrators or teachers (LEA peers), parents from other LEAs, and/or others such as university faculty or contracted individuals. Table 3 displays the responses to the RRC survey items concerning types of individuals included on state teams. States that include all possible categories on their teams are shaded in the table.

Table 3
Composition of State Monitoring Teams

STATE	SEA Staff	LEA Peers	Parents	Others
AL	✓			
AK	✓			✓
AR	✓	✓		
AZ	✓	✓		
CA	✓	✓		
CO	✓	✓	✓	✓
CT	✓			
DE	✓			✓
FL	✓			
GA	✓			
HI	✓	✓		
IA	✓			
ID	✓	✓	✓	✓

STATE	SEA Staff	LEA Peers	Parents	Others
IL	✓	✓	✓	✓
IN	✓	✓		✓
KS	✓	✓		✓
KY	✓	✓		✓
LA	✓	✓		✓
MD	✓			
MA	✓			
ME	✓	✓		✓
MI	✓	✓		✓
MN	✓	✓		✓
MS	✓			
MO	✓	✓		
MT	✓	✓		✓
NC	✓	✓		
ND	✓			✓
NE	✓	✓	✓	✓
NM	✓			
NV	✓	✓		✓
NH	✓	✓		✓
NJ	✓			
NY	✓			
OH	✓			
OK	✓			
OR	✓	✓		✓
PA	✓	✓		✓
RI	✓	✓	✓	✓
SC	✓			
SD	✓	✓		
TN	✓			
TX	✓	✓		
UT	✓			✓
VT	✓	✓		✓

STATE	SEA Staff	LEA Peers	Parents	Others
VA	✓	✓		✓
WA	✓			
WV	✓			
WY	✓			✓

The survey results show that some change has occurred in these data between 1992 and 1994. Three states—Maryland, Massachusetts and Wyoming— discontinued using LEA peers, while Kentucky added them to their teams; six states that had included parents no longer do so—Indiana, Louisiana, Massachusetts, Michigan, Minnesota and Montana—while Illinois added parents to their teams; seven states that had not previously used others on their teams—Alaska, Kentucky, Maine, Nevada, North Dakota, Virginia, and Wyoming—began including them, while six states—California, Maryland, Massachusetts, Missouri, Oklahoma, and South Dakota—no longer do so.

Usually, when an SEA includes LEA peers on a monitoring team, the appointment is for one visit or, as in Minnesota, the LEA peer is entered on a list of available personnel to be called on periodically for a monitoring assignment. Some states select an LEA administrator who is scheduled for the following year's onsite cycle—a strategy that is considered beneficial to that participant as well. Maine uses a different approach: the state "buys the contract" of three LEA administrators for a year and, in conjunction with one SEA representative, they comprise the monitoring team. The LEA administrators remain on their local payroll, so there is no interruption in their employment benefits. The SEA sees this strategy as very effective with the only drawback being the loss of the contracted people after they have acquired expertise in carrying out the monitoring process.

The methods used by states to train non-SEA team members vary. For example, Indiana offers a structured two-day training course four to six times a year and maintains a list of individuals who are trained and available for assignment to teams. This formal approach was tried and rejected by Colorado in favor of a more individualized approach in which the SEA program person who chairs the team is responsible for preparing the LEA personnel and parents who comprise the membership of each team. With assistance from the Great Lakes Regional Resource Center and input from other states, the Minnesota SEA designed a system that reflects their commitment to the use of a broad-based cadre of peer monitors. Individuals must apply to this program, and selection criteria are based on the SEA's goal of having a diverse pool of peer monitors who represent all types of constituencies. The program, first implemented in the fall of 1989, includes an intense training component for peer team members.

Non-SEA team members almost always have a specific role in the work of the team even if they are not involved in every aspect of the team process. The SEA representative is usually the team chairperson and is responsible for final compliance decisions and preparation of the report. LEA peers and other education professionals are usually assigned tasks that involve interviewing district personnel and gathering information from other sources about the district's programs and services. The role of parents on a team is usually focused on the assessment of parent-related issues in the district being monitored.

States that use non-SEA members on teams expressed strong support for this approach during the 1992 data collection. State personnel used terms such as 'field colleague' and 'significant others' to refer to these added individuals which communicated the importance attached to their participation. States that provided input on this issue cited many advantages and almost no disadvantages when asked for their perception of this practice. State monitoring staff said the use of individuals other than employees of the SEA on onsite monitoring teams helps to:

- focus the process on how a district serves children rather than just whether they meet the letter of the law;
- de-emphasize the negative and adversarial connotations that the monitoring process usually carries;
- supplement a small SEA monitoring staff allowing for more comprehensive and accurate evaluation of compliance in districts; and,
- provide positive public relations for the SEA with school personnel, parents and other community constituencies.

State monitoring staff singled out the use of LEA peers on monitoring teams as especially beneficial. They said that LEA peers:

- help to forge a partnership, changing the relationship between the SEA and the LEA or IEU;
- make the monitoring process more tolerable to local units because the peers are closer to current field experience and frequently have more credibility with school staff than SEA personnel;
- provide technical assistance to their colleagues even if only informally and foster the development of professional networking for program improvement; and,
- obtain a better understanding of compliance and learn ways to improve their own district's program.

Most SEA respondents felt that there were no disadvantages to the use of non-SEA members on teams. A few cited some problems that could occur, but in all cases they were not seen as significant. The difficulties (usually expressed as only theoretically possible and not actually encountered) mentioned by State monitoring personnel were:

- some non-SEA individuals do not understand compliance as a legal concept and this can interfere with their conclusions about LEA practices;
- the presence of non-SEA members on the team can lead to a 'we-they' division if a team member appears to 'side with' the LEA or IEU being monitored;
- sometimes non-SEA members are 'too tough' or 'too lenient' when it comes to making compliance judgments;
- some people have strong biases or personal issues that interfere with their ability to be objective about the LEA/IEU; and,
- managing a team composed of different types of members is not as easy as dealing with SEA peers who are familiar working partners.

Sanctions for Non-Compliance

The 1992 report noted that there was very little difference among states in the application of sanctions for LEA non-compliance. In the 1994 survey, only 17 of the 49 states replied affirmatively to the item, "We use sanctions other than fiscal sanctions." This number is seven fewer than the 1992 survey. Actually, there is little evidence that states use formal sanctions of any kind for compliance problems. States acknowledge their power to use fiscal sanctions, but this consequence is rarely invoked. Rather, SEAs negotiate the correction of problems, applying pressure through other means such as close follow up, additional onsite visits, and the targeting of technical assistance. Most states said that, although the threat of a loss of funds is an ever-present motivation for districts to comply, they do not consider the actual withholding of funds to be an appropriate sanction except in cases of continued refusal to implement corrective actions. However, many states do apply fiscal sanctions for any errors found in an LEA child count in which ineligible students had been counted for funding purposes.

One exception to this trend was found in North Carolina where the monitoring process was changed in the last year to combine the headcount audit and the program compliance visit. Monitors now have the authority to require payback of state and federal dollars from LEAs when a compliance violation is found, and the penalties are applied automatically.

PROFILES OF SELECTED STATE MONITORING SYSTEMS

Arizona

Arizona has used a variety of strategies in its monitoring system. About 20 years ago, the SEA used teams of LEA peers in its monitoring process and this was popular with school personnel. LEA team members found that serving on teams helped them assess their own compliance status and provided them with new program ideas. However, the SEA felt that this approach did not provide enough compliance data even though it yielded lots of information on program improvement. Teams were then limited to SEA staff specifically hired for monitoring, but that approach was also found to be unsatisfactory because of rapid turnover of staff. Self-monitoring and "quality reviews" were used for a time, but this also was found to lack adequate validation of compliance.² Concerns had also been expressed by OSEP that self-validation would not be stringent enough.

Five years ago, Arizona implemented a new monitoring system, the Collaborative Compliance Program Review (CPR), that is designed to be a part of overall education reform and school improvement. The rationale for the new system as stated by the SEA (Arizona Department of Education, 1993) is the need to balance the current procedural focus of special education accountability with an increasing emphasis on outcomes for students with disabilities. In addition, the SEA felt that the monitoring process excluded school district staff from participation and did not recognize the changing roles and responsibilities for both state and local educators and administrators.

Under the new system, districts may opt to participate in the CPR as an alternative to the standard monitoring review if they meet certain criteria that include a commitment to the new process and a lack of major compliance problems in the past. Once a district is chosen, they are awarded a grant of \$2,000 to make staff available to be a part of the newly-structured monitoring team that includes representatives from all general and special education sections of the LEA and, at the option of the district, that could include parents. This working group is trained by the SEA to plan and carry out the actual monitoring. They must develop a plan that includes the required components of the standard monitoring review and at least one element not related to compliance. SEA staff assist in the onsite visit, but the LEA team carries out all the monitoring activities including the writing of the report. Then, a program improvement plan must be developed in addition to a plan for correcting any non-compliance.

²In the 1992 report, North Carolina personnel also described their experience with "quality reviews" as problematic. Districts that had agreed to undergo such voluntary reviews were exempted from a compliance review. Among the reasons this practice was eliminated by North Carolina was the opinion of many local administrators that they needed the forceful consequences of compliance monitoring to use as leverage to obtain or protect the resources they needed for services for students with disabilities.

SEA staff agree that the CPR is not easier or cheaper to do than the traditional process. In fact, SEA staff feel that LEA staff are more stringent on themselves than an outside monitor might be. The involvement of general and special educators at the local level has had important benefits for the districts. The flexibility of the process makes it more responsive to individual district differences, and local special education administrators report more cooperation with general educators. In addition, there is increased recognition of the importance of compliance as a result of the new procedures.

California

In California, special education is but one component in a combined compliance procedure called the Coordinated Compliance Review (CCR) that addresses all specially funded programs including migrant education, adult education and other categorical programs. The visiting team has only one member representing special education and that place may be filled by either a SEA specialist or a professional educator who has been trained in the compliance process. A single report is issued, of which special education is only one part. The CCR occurs in two phases: the LEA self-review (described above on page 9) and the state validation review.

Two variations of the process are available for school districts that meet certain criteria. A screening review that involves a one or two-day visit by SEA staff is used to see if the district's self-review is accurate enough to be accepted as the official compliance review. To qualify, a district must have an enrollment of less than 20,000, have had a previous noncompliance rate of less than 8.62 percent of all items, and have addressed past noncompliance findings. Document review is the other variation available to very small districts. A meeting is held with the district at a regional office to verify the self-review through written records. In both cases, a full validation review would follow if the abbreviated procedures suggest any significant deficiency or non-compliance.

LEA training and extensive materials are provided by the California SEA (California Department of Education, 1994) for the CCR. Two types of instruments have been devised: one to cover items that apply to more than one program, and a second that covers items specifically related to only one program. Compliance items are grouped under key strategies for each program goal, and guidelines are given on how to test for that particular compliance item and what specific materials or activities to review.

The CCR self-review includes a program item about student outcomes that, while not a compliance issue under special education, is nonetheless a required element. The particular goal is stated in the Training Manual as follows: "Multifunded students receive a coherent and coordinated program which enables them to learn the district's core curriculum." A suggested

form is provided for the LEA to submit a summary of specific data as evidence of student learning. A positive evaluation is concluded when the district shows that students with disabilities are meeting the district's grade-level expectations in the core curriculum or that they are making significant academic gains that will lead to eventual grade-level performance.

New Jersey

The 1992 report described a new monitoring approach being implemented in New Jersey that involves a visit to every school district each year to verify a portion of the compliance requirements. By selecting one quarter of the requirements each year, the SEA is able to provide training and technical assistance to the LEAs in the year prior to the onsite visit. This new approach allows the SEA to have a close working relationship with the LEA, and eliminates the 'gotcha' aspect of monitoring.

For example, one cluster of issues includes the monitoring of notice, pupil records and surrogate parents. In the year prior to the program review of these compliance elements, the SEA provided intensive training and technical assistance in these areas for all districts, and each district completed a self-study evaluation. In the following year, program review was conducted which consisted of an onsite review to verify this self-study evaluation. Corrective action plans were drawn up where needed. This pattern is repeated throughout the four-year cycle until all compliance requirements have been verified.

According to New Jersey SEA staff, the new monitoring process has been received very positively throughout the state. Districts are making changes to address compliance problems before the onsite visit and there have been very few corrective actions prescribed as a result of onsite reviews. The SEA staff also finds the process results in improved relationships with LEAs and has minimized the elaborate corrective action system.

Texas

Very little information was included in the 1992 report about Texas because the SEA was in the process of redesigning its compliance monitoring system. This design was the result of a federal monitoring visit which found Texas in non-compliance. Subsequently, the SEA completely revised its monitoring approach that is now known as the Results-Based Monitoring System (RBM). In addition to ensuring compliance, the new system design has two goals: to establish clear linkage between compliance and improved student performance, and to create collaborative relationships among SEAs, LEAs and ESCs (educational service centers).

As the first step in the RBM process, the LEA establishes a local review committee at both the school and district levels. This committee is composed of individuals from the entire range of LEA staff as well as non district individuals such as members of the local advisory group or personnel from other LEAs. The committee plans the review based on the structure of the special education program. One of the first activities is to gather information from parents. As with most of the review activities under the RBM approach, the method(s) to be used to obtain parent input is decided by the LEA. One option is using a representative sample of parents equal to the number of student eligibility folders reviewed during the local monitoring process. The LEA also determines which student folders will be chosen for the eligibility review, with the total number based on the average daily attendance of the district. A minimum percentage of student folders based on the incidence levels in each disability categories must be included.

The local monitoring document (Texas Education Agency, 1993) provides extensive explanations and forms that cover the indicators to be used. There are 19 Program Excellence Indicators to identify practices that result in successful outcomes for all students, and 58 Compliance Indicators to be reviewed to verify that minimum federal and state requirements are met. The form for each excellence indicator poses the issue, lists the sources of documentation, and provides a five-point Likert scale for rating the district's current program in that specific area. The five criteria range from no evidence to high confirmation of implementation of the excellence indicator. Explanatory notes are provided to assist the reviewer in understanding the indicator and the scaled criteria. Similar forms are used for each of the 58 compliance indicators, except that the decision of the review is limited to a yes-no response rather than a rating.

Under the RBM system, the SEA will cite a discrepancy only when it occurs systematically throughout a campus, LEA or cooperative, more closely matching the process used in the federal monitoring system. The SEA will consider a number of factors to determine if the violation is systemic or a simple human error. As a general rule, a discrepancy will be cited when a violation is found in 30 percent or more of the folders reviewed. For violations of a more serious nature such as not conducting an assessment before placement, not developing an IEP for continued placement or any violation that impacts negatively on the appropriateness of the student's education, a citation will be made whenever a single violation occurs even if in only one student folder. LEAs must develop action plans for correcting compliance discrepancies and submit them to the SEA for approval, but the LEA has maximum flexibility in choosing the strategies to be used. The LEA is not required to submit corrective actions for the program excellence indicators.

Although the RBM indicators are still under review during this pilot implementation, the following is a sample of the excellence indicators, grouped under the seven strands, from the draft local monitoring document.

- A. Family and Community Involvement:
 - Do families express an above average level of participation as partners in the educational process?
 - Does the LEA provide training to empower families to address factors that contribute to student success?
- B. Student Eligibility:
 - Is a series of intervention strategies designed by qualified individuals tried prior to a referral for special education?
 - Do assessment procedures provide information that allow goals to be developed that focus on student strengths?
- C. Student Access:
 - Do eligible students participate in all statewide mandated assessment measures as appropriate?
 - Does the LEA administer alternative performance measures for students who are exempt from state mandated achievement tests?
- D. Implementation:
 - Do students who need modified/adapted texts and other materials receive them at the same time as their nondisabled peers?
 - Are students with disabilities provided instruction in chronologically age-appropriate educational environments?
- E. Transition:
 - Are students with disabilities successful in transition to the next appropriate educational setting or to the community?
- F. Support:
 - Do districtwide committees seek input from and collaborate with representatives from the special education staff?
 - Does the LEA use teacher/student support teams to ensure student success?
- G. Program Evaluation:
 - Has the LEA developed and implemented formal evaluation systems that use a variety of strategies to measure effectiveness?

The RBM system is now in its second year of pilot testing. The Texas SEA sees the it as a true shift in priorities moving away from a total process orientation to a focus on program excellence without neglecting compliance indicators.

SUBSEQUENT CHANGES IN OSEP MONITORING

On March 2, 1995, OSEP issued a memorandum (OSEP 95-13), *Monitoring procedures of the Office of Special Education Programs*, that describes changes OSEP is

making in the 1994-95 school year as "the beginning of a process of further refining its monitoring system over the next several years." The dual focus for monitoring will be based on the following considerations:

- Some IDEA requirements "have a more direct relationship to student results than others," and those requirements will be emphasized; and,
- The primary responsibility for implementing IDEA lies with each state, so OSEP's monitoring system will stress each state's system for general supervision.

Using this focus on results and general supervision, OSEP will concentrate on the following four requirements in monitoring state compliance with IDEA:

- 1) Students with disabilities must have access to the full range of programs and services available to nondisabled children and the supports and services that they need to learn effectively in those programs;
- 2) IEPs must include statements of needed transition services no later than age 16;
- 3) Students with disabilities must be educated in the general education environment including the use of supplementary aids and services to the maximum extent possible, and a continuum of alternative placements must be available to the extent necessary to implement the IEP of each child with a disability; and,
- 4) Each state must use its systems for general supervision to ensure that all agencies comply with Part B.

Some of the other revisions of federal monitoring procedures outlined in the memorandum include notifying a wide range of national organizations about the monitoring schedule for the next school year; strengthening the public meeting process such as inviting "input regarding systemic noncompliance," conducting focus groups and other outreach efforts during the presite and onsite visits to receive more comprehensive information than is possible at a public meeting; and, using a more interactive process, including participation by the chairperson of the state advisory panel, in the development of the corrective action plan.

Other changes are also being implemented beginning with the 1994-95 monitoring cycle. For one, OSEP will no longer issue separate draft and final reports on its monitoring visits. In addition, OSEP will continue and expand its pilot program begun during the 1993-94 school year to conduct follow-up visits within 12 to 24 months after the issuance of a final

report "to determine the extent to which the state has effectively implemented selected components of the agreed-upon corrective action plan."

Although these changes were not implemented by the time of the Monitoring Conference in November, 1994, they do address some of the issues raised by the participants. Early reaction to the initiation of these changes has been positive. It remains to be seen what the longer term effects are of these modifications, and what impact they will have on the way states carry out their monitoring of IDEA compliance in local school districts.

CONCLUSIONS

The results of the 1994 survey combined with information gathered from the Third National Monitoring Conference confirm that many of the problems discussed in the 1993 report continue to exist. However, more concentrated efforts are under way to address those problems at both the federal and state levels. During the current school year (1994-95), OSEP has instituted revisions in its focus and procedures for monitoring state compliance in order to concentrate on those aspects of IDEA implementation that most directly affect results for students with disabilities. A few states are also trying to shift their LEA monitoring emphasis away from a total concentration on input and process variables in order to incorporate outcomes variables. Although these efforts are so far too few to be considered representative and too recent to be evaluated as to their eventual impact, the trend is consistent: to make compliance monitoring a component in the overall accountability for outcomes for the education of students with disabilities.

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APPENDIX A: Survey Form

**PROFILES OF STATE MONITORING SYSTEMS
REGIONAL RESOURCE CENTER PROGRAMS**

Purpose:

This information is being collected to prepare a resource document for use by SEA staff responsible for developing and improving SEA program monitoring systems for infants, children and youths with disabilities. The 30-40 page product will include a matrix that serves as a quick index to the characteristics of state systems plus some contact and narrative information. The document will be distributed to all 60 states and jurisdictions currently receiving Federal Special Education funds and to other interested organizations and agencies.

Directions:

1. Please complete this form and add a brief narrative.
2. Your answers should describe your system as of March 15, 1994. If you plan to make changes, indicate so in item #40 and in the brief narrative.
3. Send or call in your responses to your Regional Resource Center contact person by **April 11, 1994.**

Contact Information:

Current Date: _____

State: _____

Name of Primary Contact for Monitoring: _____

SEA Unit: _____

Address: _____

City/ State/ Zip: _____

Phone#: _____ Fax#: _____

SpecialNet: _____ Internet: _____

Demographics:

- 1 Number of entities that must be monitored:
a) LEAs _____ b) IEUs _____ c) Other State Entities _____ d) Private Entities _____

- 2a IDEA child count taken December 1, 1993 for ages 3-21: _____
- 2b Chapter I child count taken December 1, 1993: ± _____
- 2c Total Child Count (IDEA + Chapter I): ≡ _____
- 3 Name of agency that monitors Part H: _____

Staffing:

Full Time Equivalent (FTE) staff employed for monitoring (Note: 1.0 FTE might represent several people part time)

- 4a Located in SEA Central Office : _____ FTE
- 4b Located elsewhere: _____ (FTE)
- 5 Changes in number of monitoring staff (+ or - FTE) since March 1, 1993: _____

Personnel used as part of monitoring team(s) include:

- | | | | |
|---|---|---|---|
| 6 | SEA staff (regardless of office location) | Y | N |
| 7 | LEA peers | Y | N |
| 8 | Parents | Y | N |
| 9 | Others (e.g., IHE faculty, contracted personnel)
(If yes, please specify in state narrative) | Y | N |

Process and Materials

- 10 Our current cycle (in years) for comprehensive onsite visits is _____ years.
- | | | | |
|----|--|---|---|
| 11 | Child count verification is part of our onsite process. | Y | N |
| 12 | We use focused/targeted monitoring.
(If yes, briefly describe in state narrative) | Y | N |
| 13 | LEA self-monitoring is a part of our process. | Y | N |
| 14 | Our monitoring is conducted in conjunction with other SEA units | Y | N |
| 15 | Our monitoring is conducted in conjunction with the Part H Lead Agency | Y | N |
| 16 | Our monitoring goes beyond legal obligations to include program quality/effectiveness. | Y | N |

17	Our monitoring goes beyond legal obligations to include student outcomes/results.	Y	N
18	We provide TA as a formal part of our monitoring process. (If yes, briefly describe in state narrative)	Y	N
19	We formally collect information from parents (e.g., via surveys, interviews, public forums).	Y	N
20	We use a computer database of LEA data of off-site monitoring.	Y	N
21	We use computers during on-site process.	Y	N
22	We generate our reports via computer (other than word processor).	Y	N
23	LEA application review is a part of our monitoring process.	Y	N
24	LEA policy/procedures review is a part of our monitoring process.	Y	N
25	LEA interagency agreements review is a part of our monitoring process.	Y	N
26	We use sanctions other than fiscal sanctions.	Y	N
27	We have written interpretative standards for assessing compliance.	Y	N
28	We have written criteria for selecting LEAs to be monitored.	Y	N
29	We have an instruction/training manual for monitors.	Y	N
30	We use a consistent sampling formula for selecting student records.	Y	N

Forms

31	We have standardized forms available for LEA adoption.	Y	N
32	We have and use an LEA policy and procedures review form.	Y	N
33	Our IEP record review form goes beyond compliance issues.	Y	N
34	We have and use interview forms designed specifically for monitoring.	Y	N
35	We have and use mail or telephone survey forms.	Y	N
36	We have and use a summary checklist (to integrate findings).	Y	N
37	We have and use a standardized monitoring report/narrative format.	Y	N

Changes

- | | | | |
|----|--|---|---|
| 38 | We have made adaptations in our monitoring system to reflect LEA/Head Start collaboration. | Y | N |
| 39 | We have made adaptations in our monitoring process to address unique early childhood issues (Section 619/preschool, Part H to Part B transition) | Y | N |
| 40 | We are making or considering major revisions to our system. | Y | N |

Narrative Summary

Please provide a summary of the key elements of your system, including information related to items (9, 12, 18) limiting yourself to approximately 300 words (attach an abstract if one has already been written and use extra pages if necessary). Please cover the following in your narrative: 1) Overview of the system (general procedures/approach). 2) Features that might be considered unique. 3) Changes being considered.

Please indicate materials on the following topics that you are willing to share on request:

- a Materials that might help others improve systems of corrective action and technical assistance.
- b Materials that might help others to use unique or "state of the art" techniques in monitoring (e.g., technology, linking cyclical with focused monitoring , databases).
- c Materials that might help others to monitor the IEP.
- d Materials that might help others to develop interpretive standards, define required documentation and/or maintain consistency among monitors.
- e Materials that might help others with the issue of "monitoring and the school reform movement."
- f Materials that might help other unitary SEAs (SEAs that are also LEAs) to conduct monitoring.
- g Materials that might help others in monitoring for outcomes.
- h Sample copies of technical assistance documents. (Please specify):
- i. Other (please specify):

Please remember:

Send or call in your responses to your Regional Resource Center contact person by **April 11, 1994.**

APPENDIX B: Chart of Selected Survey Responses

Notes on the Chart Contained in Appendix B

Some of the data contained in the original report of the RRC-conducted survey were discussed with SEA personnel and some revisions and additions were made available. The asterisks on the chart are explained as follows:

- * Hawaii is a one-district state, so the number of LEAs is not applicable.
- ** In Michigan, intermediate units monitor their LEAs during the two years that the SEA does not monitor them. Each IEU has part-time staff assigned to this task approximately half time.
- *** Massachusetts has 22 staff whose responsibility includes monitoring all program areas including special education, complaint management and technical assistance.
- **** In New Jersey, every LEA is monitored every year on approximately one-quarter of the total requirements. This system is discussed more fully in the analysis section of the report.

It should also be noted that, because of time constraints and the difficulty in establishing contact to verify and discuss their responses, data for the 10 non-state jurisdictions was not included in the in the analysis narrative. The chart does contain the responses submitted by the nine jurisdictions that responded to the survey for the specific components covered in this report.



STATE	AL	AK	AR	AZ	CA	CO	CT	DE	FL	GA	HI	IA
DEMOGRAPHICS												
LEAs monitored	130	54	107	215	1,150	36	166	16	67	184	*	390
IEUs monitored	0	1	0	0		14	0	0	0	0	*	15
Other state entities monitored	6	1	3	6	18	12	0	3	37	43		3
Private entities monitored	28	0	35			60	54	0	0	12		5
IDEA child count (12/1/93)	98,053	14,349	49,839	67,905	529,540	62,757	68,807	12,419	272,147	120,784	14,125	61,905
Chapter I child count (12/1/93)	1,831	3,657	3,412	1,625	4,390	3,838	7,039	2,777	17,392	2,359	1,123	1,495
Total child count (IDEA + Ch.I)	99,884	18,006	53,251	69,530	533,930	66,595	75,846	15,196	289,539	123,143	15,248	63,400

STAFFING

Monitoring staff in SEA central office	10	3	8	8	7	3	4.5	6	4	6	9	1.5
Monitoring staff located elsewhere	0	0.25	3	5.5	2	0	0	0	0	0	0	0
Staff change since 3/1/93	0	0	0	0	0	0	0	1	0	0	0	0

COMPOSITION OF MONITORING TEAM

SEA staff on monitoring team	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
LEA peers on monitoring team	N	N	Y	Y	Y	Y	N	N	N	N	Y	N
Parents on monitoring team	N	N	N	N	N	Y	N	N	N	N	N	N
Others on monitoring team	N	Y	N	N	N	Y	N	Y	N	N	N	N

PROCESS AND MATERIALS

Cycle for LEA onsite visits	2	5	3	5	4	5	5	4	4	5	3	3
Use focus/targeted monitoring	N	N	Y	Y	N	Y	Y	Y	N	Y	Y	N
LEA self-monitoring is part of process	N	N	N	Y	Y	Y	Y	N	Y	Y	N	N
Monitor in conjunction with other SEA units	N	Y	N	N	Y	N	Y	N	Y	N	N	N
Monitor in conjunction with Part II	N	N	N	N	N	Y	Y	N	Y	N	N	Y
Monitoring includes program quality/effectiveness	Y	N	N	Y	Y	Y	Y	N	N	N	Y	N
Monitoring includes student outcomes/results	N	N	N	N	Y	N	N	N	N	N	N	N
Formally collect information from parents	Y	Y	N	Y	Y	Y	N	Y	N	Y	Y	N
Use computerized LEA data for off-site monitoring	Y	N	N	N	Y	Y	Y	Y	Y	N	N	N
Use computers during onsite monitoring	N	N	N	N	N	Y	N	N	Y	Y	N	Y
Use sanctions other than fiscal	Y	N	Y	N	Y	N	Y	N	N	N	N	N
Have an instruction/training manual for monitors	Y	N	Y	Y	Y	N	N	Y	Y	Y	Y	Y
Use a consistent sampling formula for student records	Y	N	Y	Y	Y	N	Y	Y	Y	Y	Y	Y

CHANGES

Made changes to address early childhood issues	Y	Y	N	N	Y	Y	Y	N	Y	Y	N	Y
Making or considering major revisions in monitoring	N	Y	Y	Y	N	N	N	Y	Y	N	Y	Y

STATE	ID	IL	IN	KS	KY	LA	MD	MA	ME	MI	MN	MS
DEMOGRAPHICS												
LEAs monitored	113	NA	65	304	176	66	24	354	161	536	400	153
IEUs monitored	5	96		41		4	0	0	15	57	47	0
Other state entities monitored	10	3	80	14	2	3	5	0	2	5	5	10
Private entities monitored		0		11			0	150		0	2	17
IDEA child count (12/1/93)	22,256	213,184	119,629	47,481	79,516	84,853	93,236	138,136	28,459	166,049	88,111	63,425
Chapter I child count (1/1/93)	1,280	44,802	8,332	2,960	1,023	2,078	4,762	22,139	891	15,202	2,807	728
Total child count (IDEA - Ch.I)	23,536	257,986	127,961	50,441	80,539	86,931	97,998	160,275	29,350	181,251	90,918	64,153

STAFFING

Monitoring staff in SEA central office	7	8	5	5	2	1	3	***22	5	2	6.5	14.1
Monitoring staff located elsewhere	4	7	0	0	0	4	0	0	0	**	0	0
Staff change since 3/1/93	2	0	(3)	(2)	(2)	0	1		2	0	1	1

COMPOSITION OF MONITORING TEAM

SEA staff on monitoring team	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
LEA peers on monitoring team	Y	Y	Y	Y	Y	Y	N	N	Y	Y	Y	N
Parents on monitoring team	Y	Y	N	N	N	N	N	N	N	N	N	N
Others on monitoring team	Y	Y	Y	Y	Y	Y	N	N	Y	Y	Y	N

PROCESS AND MATERIALS

Cycle for LEA onsite visits	5	6	5	5	6	4	3-4	7	5	3	6	5
Use focus/targeted monitoring	Y	Y	Y	N	N	Y	Y	Y	N	Y	Y	Y
LEA self-monitoring is part of process	Y	N	N	N	Y	Y	Y	N	Y	Y	Y	Y
Monitor in conjunction with other SEA units	N	N	N	N	N	N	N	Y	N	N	N	Y
Monitor in conjunction with Part II	N	N	N	N	N	N	N	N	N	N	Y	N
Monitoring includes program quality/effectiveness	Y	N	N	N	N	Y	N	N	Y	Y	N	N
Monitoring includes student outcomes/results	Y	N	N	N	N	N	N	N	Y	N	N	N
Formally collect information from parents	Y	Y	Y	Y	N	N	N	Y	Y	N	Y	Y
Use computerized LEA data for off-site monitoring	Y	N	Y	Y	N	N	Y	N	N	Y	Y	N
Use computers during onsite monitoring	Y	N	Y	Y	N	N	N	N	N	Y	Y	N
Use sanctions other than fiscal	N	N	N	Y	N	N	N	N	N	Y	Y	Y
Have an instruction/training manual for monitors	N	Y	Y	Y	N	Y	Y	N	N	Y	Y	Y
Use a consistent sampling formula for student records	N	Y	Y	Y	Y	N	Y	Y	Y	Y	Y	Y

CHANGES

Made changes to address early childhood issues	Y	N	Y	Y	Y	N	Y	Y		N	Y	Y
Making or considering major revisions in monitoring	N	Y	Y	Y	Y	N	N	Y	Y	Y	Y	Y

STATE	MO	MT	NC	ND	NE	NM	NV	NH	NJ	NY	OH	OK
DEMOGRAPHICS												
LEAs monitored	536	235	120		692	89	17	176	585	714	612	554
IEUs monitored				31				3	0	38	88	
Other state entities monitored	5			3	6	9	1	2	125	29	89	3
Private entities monitored	56			3	450			30	137	113	0	
IDEA child count (12/1/93)	110,211	18,263	135,067	11,942	36,238	43,178	24,624	21,652	185,844	346,863	215,090	71,169
Chapter I child count (12/1/93)	3,797	508	1,446	498	874	296	618	1,752	4,493	18,834	4,785	1,962
Total child count (IDEA + Ch.I.)	114,008	18,771	136,513	12,440	37,112	43,474	25,242	23,404	190,337	365,697	219,875	73,131

STAFFING

Monitoring staff in SEA central office	10	3	3	1	2.5	4	0.33	0.33	0.004	2	13	9
Monitoring staff located elsewhere	1	0	0	0	2			0.66	8	45	0	6
Staff change since 3/1/93	(1)	0.25	(2)	0	0			(0.66)	0	(2)	0	8

COMPOSITION OF MONITORING TEAM

SEA staff on monitoring team	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
LEA peers on monitoring team	Y	Y	Y	N	Y	N	Y	Y	N	N	N	N
Parents on monitoring team	N	N	N	N	Y	N	N	N	N	N	N	N
Others on monitoring team	N	Y	N	Y	Y	N	Y	Y	N	N	N	N

PROCESS AND MATERIALS

Cycle for LEA onsite visits	5	5	5	5	5	3	3	5	0.004	7	8	4
Use focus/targeted monitoring	Y	N	N	N	Y	N	N	N	N	Y	Y	N
LEA self-monitoring is part of process	N	N	N	N	N	N	Y	Y	Y	N	Y	N
Monitor in conjunction with other SEA units	Y	N	N	N	N	Y	N	N	N	Y	N	N
Monitor in conjunction with Part H	N	N	N	N	Y	Y	N	N	N	Y	N	N
Monitoring includes program quality/effectiveness	N	N	N	Y	N	N	Y	N	N	Y	Y	N
Monitoring includes student outcomes/results	N	N	N	N	N	N	N	N	N	N	N	N
Formally collect information from parents	N	Y	N	Y	N	Y	Y	Y	Y	N	N	Y
Use computerized LEA data for off-site monitoring	Y	N	N	N	Y	N	N	Y	Y	Y	Y	N
Use computers during onsite monitoring	N	N	N	Y	N	Y	N	Y	Y	Y	N	N
Use sanctions other than fiscal	Y	N	N	N	N	Y	N	Y	Y	N	N	Y
Have an instruction/training manual for monitors	Y	Y	N	Y	N	N	Y	Y	Y	Y	Y	Y
Use a consistent sampling formula for student records	Y	N	Y	N	Y	N	Y	Y	Y	Y	N	Y

CHANGES

Made changes to address early childhood issues		N	Y	N	N	N	Y	Y	N	N	N	Y
Making or considering major revisions in monitoring	N	Y	Y	Y	N	N	N	Y	Y	Y	Y	Y

STATE	OR	PA	RI	SC	SD	TN	TX	UT	VT	VA	WA	WV	WY
DEMOGRAPHICS													
LEAs monitored	269	501	36	91	178	139	1,048	40	60	136	296	55	49
IEUs monitored	0				4		20	0	0		0		1
Other state entities monitored	128		2	23	5	35	2	2	3	52	30	9	7
Private entities monitored			25		24	47	30	4	18	58	0		6
IDEA child count (12/1/93)	52,288	187,323	22,096	79,908	15,208	115,601	396,160	49,985	9,182	131,133	96,667	42,577	12,029
Chapter I child count (12/1/93)	10,924	23,503	1,509	2,022	699	3,545	15,757	1,965	1,646	3,927	4,587	1,961	451
Total child count (IDEA + Ch.I)	63,212	210,826	23,605	81,930	15,907	119,146	411,917	51,950	10,828	135,060	101,254	44,538	12,480

STAFFING

Monitoring staff in SEA central office	13	5	5	4	2.4	4	15	1	2	8	1	4	2.5
Monitoring staff located elsewhere	0	0	0	0	3.5	9	5	4	0	0	1	0	0.5
Staff change since 3/1/93	0	0	0	0	0	4	2	0	0	(4)	(1)	0	0

COMPOSITION OF MONITORING TEAM

SEA staff on monitoring team	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
LEA peers on monitoring team	Y	Y	Y	N	Y	N	Y	N	Y	Y	N	N	N
Parents on monitoring team	N	N	Y	N	N	N	N	N	N	N	N	N	N
Others on monitoring team	Y	Y	Y	N	N	N	N	Y	Y	Y	N	N	Y

PROCESS AND MATERIALS

Cycle for LEA onsite visits	6	6	5	4	4	5	5	3	5	5	3	4	5
Use focus/targeted monitoring	N	Y	N	N	N	Y	Y	N	Y	N	N	Y	N
LEA self-monitoring is part of process	N	Y	N	Y	N	Y	Y	N	Y	N	Y	N	N
Monitor in conjunction with other SEA units	Y	N	N	Y	N	N	Y	N	N	Y	N	Y	N
Monitor in conjunction with Part H	Y	N	N	N	N	N	N	N	N	N	N	N	N
Monitoring includes program quality/effectiveness	N	N	N	Y	N	Y	Y	Y	N	N	Y	N	N
Monitoring includes student outcomes/results	N	N	N	N	N	N	Y	N	Y	N	N	N	N
Formally collect information from parents	Y	Y	Y	Y	Y	N	N	Y	Y	Y	Y	Y	Y
Use computerized LEA data for off-site monitoring	Y	Y	N	N	N	N	Y	Y	N	Y	Y	N	N
Use computers during onsite monitoring	Y	N	N	N	Y	N	N	Y	N	Y	Y	N	N
Use sanctions other than fiscal	N	Y	N	N	Y	Y	Y	N	Y	N	N	Y	N
Have an instruction/training manual for monitors	Y	Y	N	Y	Y	N	Y	Y	Y	Y	Y	N	Y
Use a consistent sampling formula for student records	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	Y	N	N

CHANGES

Made changes to address early childhood issues	Y	N	N	Y	Y	N	N	Y	N	N	Y	N	N
Making or considering major revisions in monitoring	N	N	Y	Y	N	N	Y	N	Y	Y	Y	Y	N

4.1

4.0



STATE	AS	BIA	CNMI	DC	FSM	GU	RMI	ROP	VI
DEMOGRAPHICS									
LEAs monitored	1	23	1	1	4	1	1	1	2
IEUs monitored	NA		NA			NA	NA	NA	1
Other state entities monitored	NA		NA	2		NA	NA	NA	
Private entities monitored	NA		NA	57		NA	NA	NA	
IDEA child count (12/1/93)				2,055					
Chapter I child count (12/1/93)				4,939					
Total child count (IDEA+Ch.I)	0	0	0	6,994	0	0	0	0	0

STAFFING

Monitoring staff in SEA central office	0.25	4	1	8	0.75	2	1.5	0.5	1
Monitoring staff located elsewhere	0	1	0	0	0.25	0		0	1
Staff change since 3/1/93	0	0	0		0	0		0	

COMPOSITION OF MONITORING TEAM

SEA staff on monitoring team	Y	Y	N	Y	Y	Y	Y	Y	Y
LEA peers on monitoring team	N	N	N	Y	Y	N	N	N	N
Parents on monitoring team	N	N	N	Y	Y	N	N	N	Y
Others on monitoring team	N	N	N	Y	Y	N	N	N	Y

PROCESS AND MATERIALS

Cycle for LEA onsite visits	3	3		2-3		3	1	1	2
Use focus/targeted monitoring	N	N	Y	N	N	Y	N	N	Y
LEA self-monitoring is part of process	N	Y	N	Y	Y	Y	N	N	Y
Monitor in conjunction with other SEA units	N	Y	N	N	Y	N	N	N	Y
Monitor in conjunction with Part H	N	N	N	N	N	Y	Y	Y	N
Monitoring includes program quality/effectiveness	N	N	Y	N	Y	Y	N	N	Y
Monitoring includes student outcomes/results	N	N	Y	Y	Y	Y	N	N	Y
Formally collect information from parents	N	Y	N	Y	Y	Y	Y	Y	Y
Use computerized LEA data for off-site monitoring	N	N	N	N	Y	Y	N	N	Y
Use computers during onsite monitoring	N	Y	N	N	Y	Y	N	N	N
Use sanctions other than fiscal	N	Y	N	Y	Y	Y	N	N	Y
Have an instruction/training manual for monitors	N	Y	N	Y	Y	N	Y	Y	Y
Use a consistent sampling formula for student records	N	Y	Y	Y	Y	Y	N	N	Y

CHANGES

Made changes to address early childhood issues	N	N	N	N	N	N	N	N	N
Making or considering major revisions in monitoring	N	Y	Y	N	N	Y	Y	Y	Y

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