# Logo for the National Center for Systemic Improvement.



State Monitoring   
Considerations Worksheet

## Purpose

The purpose of this template is to help state education agencies (SEAs) describe and document how they monitor Local Education Agency (LEA) implementation of the Individuals with Disabilities Education Act (IDEA). The considerations included in this template are designed to support SEAs and ensure their written monitoring descriptions are detailed and comprehensive, including specifying how monitoring activities interact with other components of their general supervision system. Not everything in this template is a required activity but is included to provide states with a variety of methods in which they can consider monitoring as they design, update, or review their system. By considering and responding to the questions and considerations in this worksheet, states can reflect on their monitoring system and identify opportunities for refinement and improvement.

Monitoring is a term to reflect the array of activities the SEA employs to continuously evaluate the performance and compliance of each of its LEAs. Multiple data sources and methods should be used to monitor every LEA. Monitoring activities ensure continuous examination of performance for compliance and results. Monitoring, as required by both IDEA (34 C.F.R. §§ 300.149 and 300.600) and the Uniform Guidance (2 C.F.R. § 200.332) that applies to federal grants, includes but is not limited to, risk assessment, training and technical assistance, audits (fiscal and program) and onsite reviews, verification of data, and enforcement actions to achieve and sustain compliance.

The cycle depicted in the graphic to the right can help a state think about the many details that are involved in monitoring of LEAs. Monitoring procedures within a state require some *annual decisions*, such as focus of the monitoring priorities for the year or the cycle, to determine if data indicate whether LEAs should be moved into or out of the current cycle. Monitoring typically includes some *universal activities* that apply to all LEAs that happen annually, such as SPP/APR indicators and LEA determinations. Next, there are often *pre-monitoring activities* that are conducted prior to any onsite visits, such as self-assessment, data, reviews, desk audits or training of the LEAs who are to be monitored. *Active monitoring* is the actual monitoring (reviews, audits, interviews, surveys, etc.) of the LEA and is often onsite, but it also may be conducted virtually or other means. *Post-monitoring* is the compilation of data from various monitoring activities and protocols to develop the monitoring report and determine any noncompliance, then sending the report to the LEA with noncompliance specified and required actions. *Verification of correction* is the period following the identification of noncompliance that the state will use to verify that individual student corrections are made as well as the subsequent implementation of the regulation at 100% compliance. Although depicted as a cycle, many of these activities may not happen in the order of the graphic, but this provides one way to define and document all of the components of a monitoring system.

Fill out this table to indicate the state’s process for monitoring, any changes needed and note any sources of documentation.

| **Considerations: Annual Decisions** | **Notes – Status of documentation  and other comments** | **Location of Documentation (Source/Link)** |
| --- | --- | --- |
| **System considerations**  Is the system cyclical, risk-based, or combined?   * Cyclical:   + How often are LEAs monitored?   + How many LEAs are actively monitored each year?   + Is a monitoring schedule publicly posted? * Risk-based:   + What data points, information, or elements are included in the state’s analysis of LEA risk?   + Is the risk assessment a public or internal document(s)?   + How does the state decide which LEAs to monitor? * Combined system:   + How is risk assessment incorporated into monitoring decisions with cyclical? |  |  |
| Approximately how many LEAs are monitored through this system every year?   * How does the state ensure that all LEAs are  being monitored? |  |  |
| How does monitoring include results or child/student outcomes? |  |  |
| Are there state priorities for monitoring based on other data from dispute resolution, TA, professional development (PD), data collection and analysis, SPP/APR, improvement and correction, performance data, fiscal, or other offices?   * When and how are the priorities determined? |  |  |
| Is monitoring differentiated? If so, how? Based on what data or information?   * Does the state conduct different types of monitoring, such as desk audits, onsite, virtual, targeted/focused, or other? * How are decisions made about which LEAs will engage in which type of monitoring activity? |  |  |
| Is there annual stakeholder input into the state’s monitoring process and priorities? |  |  |
| How does the state collect, track, and document its monitoring activities?   * Is there a comprehensive monitoring manual? (Internal to the agency, publicly available, or both?) * Is there a monitoring information management or tracking system? |  |  |

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| **Considerations: Universal Monitoring Activities** | **Notes – Status of documentation and other comments** | **Location of Documentation (Source/Link)** |
| --- | --- | --- |
| **SEA Monitoring Activities for All LEAs**  What are the universal monitoring activities that are conducted annually for all LEAs? Activities may include:   * Collection, review, and analysis of IDEA § 618 and § 616 (SPP/APR) data, including dispute resolution data   + Does the state have a data system for collecting and analyzing these data? How is this data system used in these annual monitoring activities? * LEA annual determinations with required actions for certain levels of determination   + How does the state make annual determinations of LEA performance, including the criteria the state uses and the schedule for notifying LEAs of their determinations?   + If the determinations are made public, what is the web link where the most recent determinations can be accessed? * Risk analysis of LEAs * Annual assurances * Guidance provided to the field by the SEA * Regular technical assistance (TA) calls with all LEAs * Statewide conferences or other statewide professional development activities * Self-assessments for all LEAs on indicators or other requirements * Universally available professional development library with modules/resources/webinars (recorded) * Fiscal review of local educational agency maintenance of effort (LEA MOE) eligibility and compliance, meeting excess cost standard for elementary and secondary education, reserving and expending proportionate share |  |  |
| **Subsequent SEA Monitoring Activities for Select LEAs**  As a result of the information yielded from the efforts above, subsequent additional or targeted activities might be appropriate for specific LEAs, depending on their performance:   * Required corrective action due to noncompliance   + Process for identifying and correcting noncompliance   + Corrective action plans   + Required TA or other actions from LEA determinations   + Data analysis or root cause analysis after review of data   + Targeted self-assessments for selected LEAs based on data collected and analyzed   + Targeted technical assistance   + Targeted professional development * Recognition of performance   + Certificates of achievement or recognition for improvement sent to LEA   + LEA recognized as model site for selected area   + LEA selected to serve as peer to other LEAs   + Incentive grant available to LEA due to performance |  |  |

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| **Considerations: Pre-Monitoring Activities** | **Notes – Status of documentation and other comments** | **Location of Documentation (Source/Link)** |
| --- | --- | --- |
| How and when are the LEAs notified of monitoring? |  |  |
| Does any training/TA/PD occur for LEAs identified prior to monitoring? If so:   * What content is included? * What format is the training/TA/PD? (e.g., pre-recorded webinar, in-person) |  |  |
| Do LEAs complete any type of self-assessment as part of monitoring? If so:   * How is self-assessment incorporated into the process? * How does the SEA provide feedback to the LEA? * Does the SEA identify noncompliance based on the self-assessment? |  |  |
| What internal activities does the state conduct to prepare for monitoring?   * Review LEA data * Train monitoring team members * Review/differentiate monitoring protocols, presentations * Contact with LEA prior to monitoring |  |  |

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| **Considerations: Active Monitoring** | **Notes – Status of documentation and other comments** | **Location of Documentation (Source/Link)** |
| --- | --- | --- |
| How does active monitoring occur? Please describe all formats (e.g., desk audits, online record/file review, onsite visit, virtual interviews interactions) |  |  |
| What components does the state include in its “active monitoring”? Describe each.   * Data verification of previously collected 618 or 616 data * Documents submitted by LEA   + What documents are submitted? * Child file reviews   + How many files are reviewed for each LEA?   + How do you decide which files and how many files to review?   + Is the protocol for review differentiated or the same for all LEAs?   + How does the state access child files from LEAs? Do LEAs send the files? Are files reviewed as part of an onsite visit? Does the state have a database that allows them access to the files? * Interviews   + Which roles in the LEA do you interview as part of monitoring?   + What is the focus of the interview for each role type? * Observations   + Do you conduct classroom or other types of observations?   + If so, how many observations and what is the focus? What are you looking for during observations? * Focus groups   + With whom do you conduct focus groups?   + What is the focus of these groups? * Family/parent engagement   + How do you review family and parent engagement as part of monitoring?   + Do you gather family or parent input as part of the process? If so, how? * Entrance/exit meetings with LEA   + What is the content of the entrance and/or exit meetings with the LEA?   + Who is asked to attend these meetings? |  |  |
| How does the state’s monitoring system address student outcomes in addition to compliance? |  |  |
| What role groups make up the state monitoring team for an LEA? |  |  |
| What data would trigger an LEA to be monitored outside of a cyclical or risk-based assessment? How is that targeted monitoring conducted? Can you provide a recent example of when this occurred and the circumstances surrounding it? |  |  |
| What is the role of the LEA during active monitoring?   * Share highlights or initiatives that are in place * Facilitate access to schools and personnel * Facilitate interviews with students and parents |  |  |

Fill out this table to indicate which of these non-traditional circumstances apply to the state and how monitoring is managed   
for each of them.

| **Considerations: Monitoring Non-Traditional LEAs or Other Entities (for each situation that applies to the state, describe fully the monitoring process**) | **Notes – Status of documentation and other comments** | **Location of Documentation (Source/Link)** |
| --- | --- | --- |
| If the state has some type of regional unit of administration (Intermediate unit of administration) how are these structures included in the monitoring process? |  |  |
| If the state has charter schools that are LEAs, are they included in the regular monitoring process and schedule? |  |  |
| How does the state include state schools for the deaf or the blind in the monitoring process? |  |  |
| How does the state include non-traditional placements (child placed by state or LEA in an out-of-state or out-of-LEA setting) in its monitoring system? |  |  |
| How does the state include correctional facilities (juvenile justice or adult corrections) in its monitoring system? |  |  |
| Are there other unique entities in the state to be accounted for? How are they (if applicable) included in the monitoring process? |  |  |
| How does the state include consultation and services for parentally-placed private school students in its monitoring system? (See also: [NCSI State Education Agency Self-Assessment: Children with Disabilities Enrolled by Their Parents in Private Schools](https://ncsi-library.wested.org/resources/749)) |  |  |

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| **Considerations: Post-Monitoring Activities** | **Notes – Status of documentation and other comments** | **Location of Documentation (Source/Link)** |
| --- | --- | --- |
| What procedures does the state have in place to issue timely reports to all monitored LEAs? |  |  |
| What follow-up or further activities happen once monitoring ends? |  |  |
| What type of report or follow-up documentation (e.g., monitoring report) does the state provide to LEAs post-monitoring? |  |  |
| Does the state issue findings by number of instances or by LEAs? Describe how it may vary based on the indicator/issue being monitored. |  |  |
| How are LEAs notified of findings of noncompliance? When does that occur? |  |  |
| Do LEAs have an opportunity to correct prior to the issuance of findings?   * If yes, please describe the process and how data are reported for individual LEAs and aggregated for state data. * If yes, describe how the state will verify the student and system level corrections, even though no findings are made. |  |  |
| If findings are made, what and how does the state require LEAs to correct? |  |  |
| What is the corrective action process (CAP)?   * Who develops the CAP? State, LEA, or collaborative? * What is included in the CAP? * What is the timeframe the state gives LEAs for verification of correction and submission of any required information? |  |  |
| What incentives and sanctions does the state use to ensure timely correction of identified noncompliance?   * Are these sanctions graduated and progressive? * How do the sanctions ensure timely correction? |  |  |
| Does the state provide TA as a follow-up to data identified during monitoring?   * Is the TA provided to all LEAs (universal) or tiered? If tiered, what determines the level of support? |  |  |

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| **Considerations: Verification of Correction** | **Notes – Status of documentation and other comments** | **Location of Documentation (Source/Link)** |
| --- | --- | --- |
| How does the state verify LEA correction of noncompliance?   * How do you track the findings of each LEA? * What is the timeframe for LEAs? * How does the state verify at student level (individual noncompliance)? * How does the state verify at system level (implementation of the regulation with updated data)? How many files are reviewed to verify correction at the system level? * Where are data around identified noncompliance and verification documentation stored at the state agency? * How does the state notify the LEA of the verification of correction? When? * What actions does/can the state take if correction does not occur within one year of identification? * What incentives and sanctions does the state use to ensure timely correction of identified noncompliance? * How does the state monitor an LEA’s ability to sustain correction? * How does the state address recurring noncompliance by an LEA in the same area? |  |  |

Fill out this table to indicate how monitoring is integrated throughout the state’s general supervision system.

| **Considerations: Integration of Monitoring with Other Components of General Supervision** | **Notes – Status of documentation and other comments** | **Location of Documentation (Source/Link)** |
| --- | --- | --- |
| How do each of the components of general supervision inform and impact monitoring activities? |  |  |
| How does information collected through monitoring inform other state-level activities such as TA and PD? Implementation of policies and procedures? Data collection, analysis and use? |  |  |
| How does dispute resolution data inform the state’s monitoring system? |  |  |
| Do the state’s program and fiscal monitoring activities intersect? If so, how? |  |  |
| How does the state evaluate the effectiveness of its monitoring activities? |  |  |

Please provide a web link to where information about the state’s general supervision policies, procedures, and process can be found.

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WestEd is the lead organization for NCSI. For more information about the work of WestEd, NCSI, and their partners,   
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