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Five Strategies for Effectively and Efficiently Staffing State Monitoring Activities



With the release of OSEP QA 23-01, “State General Supervision Responsibilities under Parts B and C of the IDEA,” the U.S. Department of Education’s Office of Special Education Programs (OSEP) has made it clear that states must monitor all local education agencies (LEAs) at least once every 6 years. Some states are grappling with the best way to meet this expectation in light of a large number of LEAs to monitor and limited state agency staff to devote to monitoring activities. The purpose of this brief is to offer state agencies several strategies for effectively and efficiently fulfilling their IDEA general supervision responsibilities and meaningfully monitoring and supporting LEAs to implement the law.

Monitoring is an important component of state general supervision systems and typically encompasses various types of activities at different levels of intensity, depending on the purpose. In its QA 23-01, OSEP defines integrated monitoring as “a multifaceted formal process or system designed to examine and evaluate an LEA’s ... implementation of IDEA.” Monitoring activities can include things like conducting interviews or focus groups with educators, administrators, students, families, or other interest holders about the LEA’s implementation of

IDEA; examining local policies and procedures; analyzing data on LEA compliance with IDEA requirements; or reviewing student files.

State education agencies are responsible for monitoring all educational programs for children with disabilities administered within the state that are responsible for implementing IDEA, including LEAs, section 619 (preschool) programs, public charter LEAs, state-operated programs, programs for children with disabilities residing in residential settings, and educational programs in juvenile and adult correctional facilities. The number of LEAs that must be monitored within states ranges from 1 to more than 1200.

NCSI has several resources available through the [NCSI General Supervision Toolkit](#) to support states with the development and documentation of their monitoring system.

The majority of states have between 150 and 500 LEAs, although quite a few exceed this number. States with larger numbers of LEAs often have staff dedicated to monitoring responsibilities, while states with very small numbers of LEAs often have a limited number of state staff who fill multiple roles and perform a variety of tasks, including conducting LEA monitoring, providing support and professional development to LEAs, investigating complaints, and addressing questions and concerns from the field. However, the “staffing” of an agency’s monitoring activities can pose a challenge to states of any size. This resource explores creative and thoughtful ways states can effectively and efficiently fulfill their LEA monitoring responsibilities.



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1. Maximize efficiencies in the monitoring system.

There are ways states can introduce efficiencies into their monitoring processes that reduce staff time and resource demands while still accomplishing the intended purpose. Consideration should be given to what (if any) monitoring activities need to occur onsite and how many team members are actually needed and for how many days. Many of the activities that are typically included in a monitoring “visit” to an LEA, for example, can be performed virtually, reducing burden on both state and local staff time and resources. For example, states can conduct virtual LEA desk audits and meetings to reduce travel. There are other possible efficiencies to help streamline state monitoring activities, including

- creating standardized templates for all monitoring communication to LEAs that can be form-filled (e.g., notice of monitoring, training about monitoring, reporting and identification of noncompliance, correction of noncompliance);
- storing all monitoring materials in a shared site (e.g., a shared drive) within the agency so that

any staff who may be involved in monitoring activities can access and download them as needed;

- creating a tracking database shared among all those with responsibilities for tracking noncompliance, verifying correction, or writing reports or letters;
- standardizing the training of state staff, contractors, and volunteers who will support monitoring activities for consistent and reliable practices (see Recommendation 5 for additional information); and
- developing and conducting standardized training for LEAs on the monitoring process and expectations and on what meets the standard for the documents and data the state will review during monitoring. Consider recording and posting the training to a state website with a contact person from the state agency listed for follow-up questions. To support LEAs’ understanding of the monitoring expectations, the state can share protocols and “teach” LEA staff the standards. LEAs that understand the standards reviewed during monitoring are also better prepared to provide a free and appropriate education to children with disabilities.

2. Contract with additional staff to fulfill state monitoring responsibilities.

Contracting is one way to increase the staff available when states may be limited or not allowed to add actual positions at the state level. Other times, vacancies at the state level may require contracts when those vacancies have been “frozen” or are difficult to fill. In addition, using contracted staff that are located throughout the state may also reduce travel time and expenses. Every state has different requirements for how they contract and how much responsibility they can give contractual staff who are acting as monitors for the state.

States have different approaches to involving contracted staff in monitoring activities. Some may have a state employee serve as the team lead for any monitoring task but use contractual staff as team members. Other states will lean on contractors to staff an entire monitoring team but retain specific responsibilities for state agency staff. Regardless of how contractors are staffed, in order to retain general oversight responsibility, someone at the state should always have ultimate responsibility for signing off on monitoring reports and for the correction or closing of the noncompliance.

Since monitoring LEA implementation of IDEA requires specialized knowledge, sometimes finding individuals qualified to serve as contractors can be a challenge. States should cast a wide net for potential applicants, including

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considering contracting with retired special education state personnel or former special education administrators, teachers, related service providers, or principals. Contractual work often appeals to retired personnel since it is usually part-time or even seasonal, depending on state policies and monitoring schedules. Another source of contractual staff could include college/university staff or in-state technical assistance/professional development (TA/PD) organizations or providers. Such individuals usually possess basic special education knowledge but will still need to be trained in state monitoring policies and procedures.

3. Have special education administrators or parent leaders from other districts volunteer to participate in state monitoring activities.

States may consider inviting “guest monitors” or “peer monitors” to support monitoring activities. These are often LEA employees (special education directors, administrators, or even building principals) whose systems are not on the monitoring schedule for the current year but are likely to be in the next year or two. Guest or peer monitors typically only participate in the monitoring of one LEA so as not to take too much time away from their own job responsibilities. LEA staff who participate as guest or peer monitors often find the experience to be a great capacity-building opportunity

that not only helps the state agency with their monitoring activities but contributes to a deepening of their own understanding of IDEA and state expectations and therefore improvement in their own system.

States may also consider engaging parents or family members with IDEA-eligible children to serve as guest monitors. Similar to when LEA staff help with state monitoring activities, parents or family members from a different LEA or a different region of the state can be used as guest monitors. The Parent Training and Information (PTI) centers in each state can partner with the state when it is identifying and recruiting family members for this guest monitor role.

Finally, states will need to consider whether a stipend (usually for the parents) or travel costs will be reimbursed for guest or peer monitors.

4. Maximize the use of state department of education (DOE) staff to support monitoring activities.

There are many staff within a state’s DOE who could contribute to monitoring activities, including desk audits, data reviews, and virtual or onsite monitoring activities.

One consideration is to restructure existing staff so that all state special education staff, across all departments, have some responsibility for monitoring as part of their positions. Education is constantly changing and, over time, the positions identified within a state agency may need to be updated

and clarified as organizational needs and expectations shift. If the monitoring responsibilities of a state agency demand additional capacity, it may be worth revisiting and reimagining existing job descriptions to extend monitoring responsibilities to other staff within a special education division. It is a reasonable expectation that any special education staff support some monitoring activities, whether they be data collection, desk reviews, interviews, or onsite monitoring visits. State agencies also often have staff in other divisions whose positions are funded, in whole or in part, by IDEA dollars (e.g., positions in data, assessment, finance). The job expectations for these staff can also be adjusted so that a percentage of their time also includes monitoring activities.

Another consideration is to partner with other divisions in the DOE who also conduct monitoring activities. Within a state education agency, there are often multiple offices (program offices and fiscal offices) conducting LEA monitoring related to some aspects of a federal grant award. States may consider combining monitoring activities across several such programs. Combining monitoring can increase the quantity of information that must be reviewed by the state, but it will also increase the number of programs contributing staff to the activities of monitoring and could reduce the number of monitoring

5 fast fives

activities any one LEA receives. Another way to partner with other divisions is to share staff during monitoring “seasons” if scheduling allows. IDEA staff could support Elementary and Secondary Education Act (ESEA) monitoring, and ESEA could support IDEA monitoring activities. Again, training, support, and quality assurance will be critical in this scenario.

5. Develop and implement training for all individuals who will be part of the monitoring teams.

All individuals who will be engaged in monitoring activities need adequate training to participate fully and effectively. States should have a standardized process for this training that is utilized regularly to be sure contracted and state staff and guest (peers or family) monitors operate with the same set of standards. Consider recording and posting the trainings so they may be accessed throughout the year (note that annual updates to trainings and corresponding materials may be needed). Training for monitoring should occur at least annually and should also include reliability testing on a regular basis.

It is also important to provide instruction to all members of the monitoring team about confidentiality and privacy expectations when they are engaged in monitoring on behalf of the state. Regardless of which strategies are employed to accomplish comprehensive monitoring, the ongoing and consistent training for and implementation of monitoring is critical to developing a valid and reliable monitoring system.

Fulfilling a state education agency’s LEA-monitoring responsibilities takes thoughtful planning. We hope the strategies included in this brief can help state leaders pursue approaches that ensure their monitoring system is both effective and efficient.

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