

Monitoring LEA Implementation of Comprehensive and Voluntary Coordinated Early Intervening Services

Section 1: Introduction and Overview

IDEA allows, and in specific circumstances, requires local educational agencies (LEAs) to use Part B funds for coordinated early intervening services (CEIS). These services are provided to children and youth who need additional academic or behavioral support to succeed in education.

There are two types of CEIS: comprehensive CEIS, which are mandatory for LEAs with significant disproportionality (see 34 CFR §300.646–647), and voluntary CEIS (see 34 CFR §300.226). This resource uses “CEIS” to refer to voluntary CEIS and “CCEIS” to refer to comprehensive or mandatory CEIS.¹ When referring to both CCEIS and CEIS, this resource uses C/CEIS. For an overview of both, please consult the *Quick Reference Guide on Coordinated Early Intervening Services* from CIFR and IDC.

Fiscal, program, and data staff share the responsibility of monitoring the planning for and expenditure of these CCEIS and CEIS funds. **Fiscal staff** must ensure that the correct amount of funds is reserved and expended, that those funds are expended on allowable costs for appropriate groups of children, and that all other fiscal requirements are met. **Program staff** must work closely with fiscal staff to ensure that LEAs budget for and expend funds in a manner to improve

outcomes for children at risk or to identify the root cause and address identified policies, practices, and procedures to reduce significant disproportionality. **Data staff** must assist both program and fiscal staff to respond to questions about the data, help LEAs understand the data that led to significant disproportionality identification and required root cause analysis, and report data to the Office of Special Education Programs (OSEP).

This resource has three sections to assist states with the understanding and monitoring of allowable activities. Section 1 provides an overview of C/CEIS, delineating and explaining the requirements for both. Section 2 includes four scenarios for C/CEIS. Each scenario includes sample proposed activities and explanations about why each activity is or is not an allowable use of C/CEIS funds. Section 3 provides rubrics to help state educational agencies (SEAs) review an LEA’s plan for C/CEIS funds.

SEAs can use this guide to help LEAs plan for C/CEIS, to support and monitor LEA implementation of C/CEIS, or to train LEAs to ensure compliance with IDEA requirements and effective implementation.

¹ Language Note: Special education, CCEIS, and CEIS services are designed to support specific children or youth. When these children or youth are school-aged, we sometimes call them students. Sometimes we use the word children as shorthand for children and youth.

Sometimes, services designed for a particular child may in fact be provided to a family member or teacher of that child. We do not always mention that fact in this document, but it is always assumed.

CCEIS and CEIS

Both CCEIS and CEIS have similarities and differences in their purposes, requirements, and usages. An LEA, at any one time, is only implementing either CCEIS or CEIS and not both. It is important for state and LEA staff to understand the fundamental differences and similarities.

CCEIS. SEAs must determine annually whether each of their LEAs has a significant racial or ethnic disproportionality in the identification of children for special education services, including the identification of children as children with disabilities in one of six common categories; the placement of those children; and the disciplinary removal of those children from their placements. LEAs with significant disproportionalities must reserve 15 percent of their total IDEA Section 611 and Section 619 funds to implement CCEIS. These CCEIS funds must be used to identify and address

the root causes of the LEA's disproportionalities. CCEIS can be used for children with and without disabilities from age 3 through grade 12, particularly, but not exclusively, children in those racial/ethnic groups who were significantly overrepresented with respect to identification, placement, or discipline. (See also 34 CFR §300.646)

CEIS. LEAs not identified as having significant disproportionality may voluntarily use up to 15 percent of their total IDEA Section 611 and Section 619 funds to provide CEIS to students who are not currently identified as needing special education or related services, but who need additional academic and behavioral support to succeed in a general education environment. (See also 34 CFR §300.226)

Requirements for Appropriate Use of C/CEIS Funds

PERIOD OF AVAILABILITY

The period of availability for C/CEIS funds is the same as that of the IDEA subgrant from which they are drawn. LEAs have up to 27 months to obligate funding and an additional three months to liquidate all obligations. The 27-month period of fund availability begins on July 1 and extends through September 30 two years later (see CIFR's *Understanding the IDEA Part B State Grant Funding Cycle and Different Fiscal Years*.)

The actual amount of time available to obligate funds for CCEIS depends on the subgrant award year from which the funds are drawn. Based on the timing of the determination of significant disproportionality, an LEA may choose from one of three different fiscal year subgrants as the source of required CCEIS funds:

- The subgrant award following the SEA determination of the LEA's significant disproportionality

- The subgrant award in the year during which the SEA determined the LEA's significant disproportionality
- The subgrant award in the year prior to the SEA determination, if three conditions are met:
 - Sufficient funds remain.
 - The LEA did not use CEIS funds from that subgrant.
 - The LEA did not reduce its required level of effort under the LEA maintenance of effort (MOE) adjustment provision (34 CFR §300.205) in that year (see also CIFR resources for LEA MOE and adjustment).

Note: When selecting previous grant years, the expenditure of the funds is limited to the original time frame of that grant year and the LEA planning must include obligating and expending the funds in that reduced time frame.

For more detail about the timing of CCEIS funds, see question C-3-10 in OSEP’s *Significant Disproportionality (Equity in IDEA) Essential Questions and Answers*.

AMOUNTS TO BE RESERVED AND USED

The regulations for both types of C/CEIS refer to 15 percent of IDEA Part B funds. However, the requirements are different and need careful monitoring by the LEA and SEA.

CCEIS: Exactly 15 percent of the LEA’s total Section 611 and Section 619 subgrants must be calculated, reserved, and used. To calculate the amount to be reserved for CCEIS, calculate the total LEA allocation (Sections 619 and 611) and multiply by 15 percent. The funds may be reserved from either or both subgrants, but the

total reserved must equal exactly 15 percent of the total of those two subgrants. The reserved funds must be used only for CCEIS for the full period of their availability.

CEIS: Up to 15 percent of the LEA’s total Section 611 and Section 619 subgrants may be used. An LEA may choose to use any amount up to 15 percent but cannot exceed 15 percent. States should monitor that LEAs do not exceed this maximum as it would be considered noncompliance for the LEA.

LEA MOE ADJUSTMENT

Under IDEA’s LEA MOE requirement, LEAs are required to maintain their level of year-to-year expenditures on special education and related services, using local-only funds or state and local funds. IDEA includes a provision that allows eligible LEAs to reduce their required level of effort by 50 percent of the increase (if any) in their annual Section 611 allocation. However, there are restrictions on this flexibility.

CCEIS: LEAs implementing CCEIS cannot take an MOE adjustment to their state and local spending in a fiscal year in which they are required to use CCEIS funds.

CEIS: LEAs taking the MOE adjustment may be limited in the amount of CEIS funds they can reserve. The combined amount taken for both voluntary CEIS and the LEA MOE adjustment cannot exceed the maximum amount available for CEIS or the maximum amount available for the LEA MOE adjustment.

ALLOWABLE ACTIVITIES

In general, both CCEIS and CEIS funds may be used to carry out activities that include, but are not limited to, professional development, educational and behavioral evaluations, services, and supports. This includes professional development to enable teachers and other school staff to deliver scientifically based academic and behavioral interventions, including scientifically based literacy instruction, and, where appropriate, instruction on the use of adaptive and instructional software. (See 34 CFR §

300.226(b)). The activities must be targeted toward children and youth who need additional academic or behavioral support, including scientifically based instruction, to succeed in general education.

CCEIS funds must be used to identify and address the factors and any policy, practice, or procedure that the LEA identifies as contributing to its significant disproportionality. It is the LEA’s responsibility to determine the contributing

factors, or root causes, for its situation. IDEA at 34 CFR §300.646(d)(1)(ii) lists some possible factors: “a lack of access to scientifically based instruction; economic, cultural, or linguistic barriers to appropriate identification or placement in particular educational settings; inappropriate use of disciplinary removals; lack of access to appropriate diagnostic screenings; differences in academic achievement levels; and policies, practices, or procedures that contribute to the significant disproportionality.” A root cause analysis and the action planning process should be conducted and can be supported with CCEIS funds. IDC’s *Success Gaps Toolkit* is one resource

that provides a roadmap and tools to help LEAs find the root causes of their significant disproportionality.

The activities for C/CEIS must align with allowable uses under IDEA and also adhere to the regulations outlined in the Office of Management and Budget (OMB) Uniform Grant Guidance. Under the OMB Uniform Grant Guidance, costs must be necessary, reasonable, allocable, and adequately documented. LEAs must use generally acceptable accounting principles to document expenditure of funds. See 2 CFR §200.403–405 for more detail.

SUPPLEMENT, NOT SUPPLANT

It is also important to remember that funds provided to LEAs under IDEA Part B must be used to supplement state, local, and other federal funds and not supplant those funds (see 34 CFR § 300.202(a)(3)). This requirement applies to all Part B funds, including any used for C/CEIS. In general, LEAs should not use C/CEIS funds to provide services that are otherwise required by

federal, state, or local law, or to provide services that were paid for with other funds in a prior year.

States should review LEA plans and monitor expenditures for C/CEIS to ensure they align with IDEA, the OMB Uniform Grant Guidance, and relevant state regulations.

CHILDREN, YOUTH, AND FAMILIES SERVED

CCEIS must be provided to children without disabilities and may also be provided to children with disabilities. Children from age 3 through grade 12 are eligible, particularly, but not exclusively, children in those racial/ethnic groups who were significantly overidentified in one or more of the 14 required identification, placement, or discipline categories (see 34 CFR § 300.646(d)(2)).

CEIS funds, on the other hand, may *only be used for students not identified as needing special education or related services* but who need additional academic or behavioral support to succeed in the general education environment. They can be used for students in kindergarten through grade 12, with a particular emphasis on those in kindergarten through grade 3. CEIS funds

are for targeted uses and may not be used for universal activities, such as tier 1 in a multi-tiered system of support.

C/CEIS-funded activities may benefit children indirectly. Examples include teacher professional development, family supports, or (in the case of CCEIS) the identification of root causes. When used for indirect services, states should provide guidance to LEAs on tracking children who benefit indirectly from C/CEIS services. For example, LEAs identify students who are in need of additional support and were instructed by teachers who received C/CEIS professional development.

DATA COLLECTION AND REPORTING

Fiscal and LEA child data must be reported by states to the U.S. Department of Education for C/CEIS. LEAs must be able to collect and report the data according to federal and state requirements when planning for and

implementing C/CEIS services. States may provide a system for collecting and reporting the data or allow the LEA to devise their own system. States should, however, ensure that there is a plan for collecting and reporting high-quality data.

Data elements related to C/CEIS:

- IDEA Part B 611 allocations for the reporting year and prior reporting year
- IDEA Part B 619 allocations for the reporting year

Data elements related to only CCEIS:

- Whether an LEA was determined to have significant disproportionality and, if so, the area(s) in which the LEA was determined to have significant disproportionality
- The amount of IDEA funds reserved for CCEIS, if any
- The number of children with disabilities served using CCEIS funds
- The number of children without disabilities served using CCEIS funds²

Data elements related to only CEIS:

- The number of children served using CEIS funds in the reporting year
- The number of children who received CEIS anytime in the past two school years and received special education and related services in the reporting year
- The amount of IDEA funds reserved for CEIS, if any

MOE reduction data elements related to C/CEIS:

- IDEA Part B 611 allocations for the previous reporting year, which may allow for an MOE reduction
- The LEA's overall determination under 34 CFR §300.600(a)(2) for the reporting year, which must "meet requirements" for an LEA to take the MOE reduction
- The amount taken for an MOE reduction, if applicable

These data are reported to the U.S. Department of Education. For more details about the data collection elements, see the *EMAPS User Guide*:

IDEA Part B Maintenance of Effort (MOE) Reduction and Coordinated Early Intervening Services (CEIS).

² SEAs started reporting the number of students with and without disabilities served using CCEIS funds with the school year (SY) 2023–24 data.

Section 2: Planning and Monitoring for Allowable Activities

SEAs must exercise their general supervision responsibilities and monitor LEAs to ensure that they implement all the requirements for C/CEIS appropriately. SEAs must ensure that the amount of funds reserved is correct and that planned activities are in line with IDEA requirements. SEAs must also monitor LEAs to ensure that the funds are actually used appropriately (2 CFR § 200.332(d)) and that the correct amounts of funds are expended.

Although not required by IDEA, as a best practice, many SEAs require LEAs to submit a plan for C/CEIS. The plan usually describes the high-level goals (e.g., addressing specific root causes of a significant disproportionality), the activities to be funded with C/CEIS funds, the budget for those activities, and which groups of children and youth

will receive services. These plans are often approved by the SEA through the IDEA subgrant application approval process before services are implemented. The level of detail required in the C/CEIS plan varies by state. Detailed plans along with a state review process help ensure that LEAs develop meaningful activities for C/CEIS and comply with IDEA requirements.

LEAs are not required to evaluate progress on their C/CEIS plans, but it is best practice for LEAs to document completion of action steps and achievement of interim process and progress goals. Consistent documentation of progress not only ensures accountability but also facilitates ongoing improvement and adjustment to effectively address significant disproportionality or other areas of need.

Sample Scenarios, with Allowable and Non-Allowable Activities

The following four scenarios each describe a fictional LEA context, some proposed activities, whether each activity is allowable or not allowable with C/CEIS funds, and why. These scenarios can be used to further explain

requirements of the regulation and to provide examples when training LEAs. They are examples only. States, along with their LEAs, must consider their particular contexts and analyze their own situations to determine allowability.

CCEIS Scenario 1: Over-suspension of Black Children with Disabilities

An LEA was identified as having significant disproportionality in disciplinary actions, specifically the disproportionate suspension of Black children with disabilities. It is therefore required to use 15 percent of its Part B funds to implement CCEIS. At the time of identification, the LEA was already implementing Positive Behavior Interventions and Supports (PBIS) in most schools, but it had been a few years since training for staff was conducted. A root cause analysis showed that the higher removal of Black children started in elementary school and continued through middle school but decreased in high school. The disproportionate suspension of Black students was evident in about half of the LEA's elementary schools, three of the middle schools, and one high school. Overall, even

though PBIS is being implemented in schools, the classroom management skills of staff were found to be weak, with little understanding of behavior modification and individualization. The LEA reviewed and determined that most behavior intervention plans for Black students with disabilities were very similar with little or no differentiation based on student needs. More differentiated behavior intervention plans were found in some schools where over-suspension of black students was not occurring, leading to a reduction in disruptive behaviors. The LEA has budgeted the required amount of CCEIS funds and also allocated some local funds to support the CCEIS plan. The LEA will use funds from the subgrant award that starts July 1 of the current year.

Table 1 shows the activities proposed by the LEA and whether the use of CCEIS funds for each activity is allowable based on this root cause analysis.

TABLE 1. ALLOWABLE AND NON-ALLOWABLE ACTIVITIES FOR CCEIS SCENARIO 1

| Proposed activity | Allowable with CCEIS Funds? | Why or why not? |
|---|-----------------------------|---|
| Pay the salary of two new staff members for two years to create and implement a CCEIS plan. | Yes | Creating an effective CCEIS plan takes time. Activities may include building a team, completing a root cause analysis, developing an action plan, creating a budget, developing and implementing an evaluation plan, collecting data, and reporting data. |
| Hire a consultant who specializes in positive and proactive behavior supports to work with staff in schools that suspend the largest number of Black children. | Yes | The school staff have little understanding of positive and proactive behavioral supports. The LEA will most effectively reduce suspensions of Black students by focusing on the schools that are suspending large numbers of Black students. These are typically schools that enroll large numbers of Black students and suspend students at high rates. |
| Pay the salary of the existing staff to continue to implement PBIS. | No | The LEA is already implementing PBIS. This would be supplanting, not supplementing. (If they were to expand staff, salaries for the new staff may be allowable costs.) |
| Hire special education teachers to fill vacant special education teacher positions. | No | CCEIS funds may not be used to provide special education services. CCEIS funds must be used to provide early intervening services to children with and without disabilities. |
| Hire literacy coaches for the schools where discipline is an issue. | No | Although literacy coaches may help teachers engage students in their learning, thus preventing discipline issues, the LEA did not determine that poor academic performance was a contributing factor to the discipline issues. |
| Provide professional development on behavior management to staff in the elementary schools that suspend the largest number of Black students | Yes | The LEA’s root cause analysis showed that the higher removal rates for Black children start in elementary school. Providing professional development to teachers and administrators in the elementary schools suspending the largest number of Black students addresses the factors contributing to significant disproportionality in the short run and, by supporting student self-regulation skills, in the long run. |
| Provide professional development to special education teachers regarding how to develop and implement high-quality behavior intervention plans. Focus on the schools that suspend the largest number of Black students. | Yes | The LEA’s root cause analysis showed that the lack of appropriate behavior intervention plans for children with disabilities was a contributing factor to the significant disproportionality. This is allowable for special education teachers because there are other CCEIS activities that are also being expended to support children without disabilities. (CCEIS funds cannot be used exclusively for children with disabilities.) |

CCEIS Scenario 2: Overidentification of Children with Other Health Impairments

An LEA has been identified as having significant disproportionality in the area of identification of White students as having other health impairments (OHI) and is required to use 15 percent of its Part B funds to provide CCEIS. The LEA was identified using an alternate risk ratio, so the rate for White children in the LEA was compared with the rate for non-White children in the state. With data assistance from the state, the LEA’s root cause analysis found that it was identifying children as OHI—regardless of race—at 4.8 times the rate of the rest of the state. The LEA found that four middle schools and two high

schools were making initial identification at higher rates than expected. Many of the students’ referrals to special education came from their parents, not the teachers or school staff. The school psychologist relied heavily on information from the students’ physicians and many times did not complete a comprehensive psychological evaluation. The LEA also found that prior to the referral to special education, most of these students had adequate academic performance without additional supports and had few disciplinary issues that caused removals from school.

Table 2 shows the activities proposed by the LEA and whether the use of CCEIS funds for each activity is allowable based on this root cause analysis.

TABLE 2. ALLOWABLE AND NON-ALLOWABLE ACTIVITIES FOR CCEIS SCENARIO 2

| Proposed activity | Allowable with CCEIS funds? | Why or why not? |
|--|-----------------------------|--|
| Pay part of the salary of a staff member to conduct a robust root cause analysis, and create, implement, and monitor a CCEIS plan. | Yes | CCEIS funds may be used to pay salaries to lead the implementation of CCEIS activities including planning and oversight. |
| Provide professional development to school psychologists regarding eligibility criteria for identifying students with OHI. | Yes | The LEA’s root cause analysis showed that many of the students identified with OHI did not have a comprehensive psychological evaluation prior to being found eligible for special education as a student with OHI. |
| Pay a stipend to teachers to provide tutoring to students they consider at-risk for academic failure. | No | The LEA’s root cause analysis showed that the students identified as OHI were, prior to their referral to special education, performing adequately and had few disciplinary issues resulting in removal from school. |

| Proposed activity | Allowable with CCEIS funds? | Why or why not? |
|--|-----------------------------|---|
| Hire a consultant to revise the LEA’s evaluation practices and procedures for adhering to eligibility criteria with special emphasis on evaluating students for OHI. | Yes | The LEA’s root cause analysis showed that school psychologists were not following the proper evaluation protocol, and school staff were determining eligibility without complete information. |
| Pay part of the salary of the LEA’s special education fiscal manager to manage the budget for CCEIS. | No | The LEA is already providing a salary to a special education fiscal manager who should be monitoring all aspects of the Part B funds. |

CEIS Scenario 1: Addressing Learning Disruption for Highly Mobile, At-Risk Students

The student population in an LEA has grown and become more mobile with children experiencing disruptions in education. The LEA has an increasing number of children with disabilities experiencing frequent family moves that result in new schools or LEAs. An analysis shows lower academic performance and higher disciplinary rates for these mobile students in elementary grades. The LEA examined achievement data and has seen a slight to moderate decrease in math and reading proficiency in the elementary grades

and an increase in office referrals and disciplinary incidents that result in out-of-school suspension (OSS). Further data analysis showed that many of the students who had attended multiple schools in multiple LEAs during their elementary school years were performing poorly and had experienced several disciplinary referrals resulting in OSS. Based on this analysis, the LEA decided to use up to 15 percent of its Part B funds to develop a plan and implement CEIS to address learning disruptions for highly mobile, at-risk students.

TABLE 3. ALLOWABLE AND NON-ALLOWABLE ACTIVITIES FOR CEIS SCENARIO 1

| Proposed activity | Allowable with CEIS funds? | Why or why not? |
|--|----------------------------|--|
| Hire academic coaches to work with teachers to help them differentiate their instruction, particularly for teachers of highly mobile students. | Yes | Data showed that highly mobile students experienced frustration and behavior issues when presented with academic assignments. Academic coaches may help teachers differentiate instruction, engage students, help students experience success, and improve student outcomes. |

| Proposed activity | Allowable with CEIS funds? | Why or why not? |
|--|----------------------------|---|
| Purchase office equipment (furniture, laptop, office supplies) for newly hired academic coaches. | No | Although the office equipment is for new hires that will directly support CEIS activities, office furniture, equipment, and supplies are not an allowable use of funds. CEIS funds may be used to provide professional development, educational and behavioral evaluations, services, and supports. |
| Pay for after-school tutoring for highly mobile students who are at risk. | Yes | Additional instructional time for highly mobile students may result in improved academic performance; therefore, tutoring is directly connected to the factors that were identified as putting students at risk for school failure. |
| Provide transportation home for students who stay after school for tutoring. | Yes | Because transportation is necessary for students to be able to attend the after-school tutoring, the LEA may use CEIS funds to pay for transportation. |
| Hire a PBIS coach and begin to implement PBIS to support staff in schools where disciplinary referrals are high. | Yes | In analyzing the data, the LEA hypothesized that the poor performance was due in part to disciplinary removals. Implementing PBIS is an allowable use of CEIS funds when it addresses the reasons that students are at risk. |
| Pay for the salaries of additional special education teachers to reduce pupil-teacher ratio in classrooms. | No | CEIS funds may not be used to hire special education teachers. CEIS funds may only be used to provide early intervening services to students without disabilities. |
| Pay teachers after hours to create engagement resources to help families work with the students at home. | Yes | This LEA has an increasing number of students experiencing frequent family moves. Creating resources to support these families is a positive activity. |

CEIS Scenario 2: LEA at Risk for Significant Disproportionality for Hispanic Students

The SEA issued a notice to the LEA that it is at risk of being identified as having significant disproportionality for discipline, specifically for Hispanic students with disabilities for both OSS and in-school suspensions (ISS). The LEA is currently implementing PBIS in selected schools. The LEA reviewed data and determined that OSS were occurring predominately at the

middle and high school levels while the majority of the ISS were at the elementary and middle school levels. The data also showed that OSS was occurring for students without disabilities in all races/ethnicities at a higher rate than desired. Attendance rates and academic achievement measures for Hispanic students were lower than other races/ethnicities in the

LEA. Parent/family attendance at school events, parent-teacher conferences, and parent leadership groups also shows lower rates for families of Hispanic students. The student population is 50 percent Hispanic; the school

staff is 10 percent Hispanic. The student population is 30 percent Spanish-first English learners; 8 percent of the school staff speak Spanish.

TABLE 4. ALLOWABLE AND NON-ALLOWABLE ACTIVITIES FOR CEIS SCENARIO 2

| Proposed activity | Allowable with CEIS funds? | Why or why not? |
|--|----------------------------|---|
| Pay the salary of an additional PBIS coach to address the disciplinary issues and ensure PBIS is being implemented with fidelity, targeting schools with the highest rates of ISS and OSS. The additional coach will be fluent in Spanish. | Yes | Although the LEA is already implementing PBIS, it intends to expand PBIS with a new coach. Because CEIS funds will not pay the salary of the previously employed coach, this is not supplanting. CEIS funds will only pay for expanded program staff. Fluency in Spanish will support that coach’s ability to communicate with at-risk Hispanic students. |
| Provide professional learning opportunities to teachers to build their capacity to work with families, especially families whose native language is not English. | Yes | The LEA’s root cause analysis showed that school staff needed to learn how to work more effectively with parents of Hispanic students to improve attendance and academic performance and decrease disciplinary incidents. |
| Expand the English learner (EL) program in the LEA by hiring two additional EL teachers. | Maybe | The LEA’s root cause analysis did not identify the EL program as a reason the Hispanic students are at risk, so this intervention is unlikely to decrease the LEA’s disproportionality. However, the funds are serving a group of students who need additional academic support, so the activities may be allowable. The state may ask the LEA to provide more rationale for this activity funded with CEIS resources. |
| Pay the partial salary of a bilingual academic coach to work with teachers to implement strategies and differentiate instruction, especially for Hispanic students. | Yes | Based on its data analysis, poor academic performance was a contributing factor to many of the disciplinary incidents; differentiation of instruction may improve academic proficiency and reduce behavioral incidents. The LEA is funding an entirely new academic coach position with both CEIS and local funds; a portion of that position is dedicated to improving the instruction of Hispanic students to address the disproportionality. |
| Provide professional development and coaching to all staff in three targeted schools on implementing a research-based program to improve attendance. The targeted schools will be those that suspend the most Hispanic students. | Yes | Implementing a research-based program in targeted schools in the LEA with professional development and ongoing coaching can improve school attendance and student progression in school in a way that reduces the disproportionality. |

| Proposed activity | Allowable with CEIS funds? | Why or why not? |
|---|----------------------------|---|
| Purchase technology (laptops, tablets, etc.) for students to use at home to complete assignments. | Maybe | The LEA must ensure that the students using the technology are the students targeted to receive CEIS. |

Section 3: Rubrics to Review LEA Plans

States have a responsibility to support and oversee LEAs’ implementation of CEIS and significant disproportionality (including CCEIS) regulations. LEAs should be trained and supported in their efforts. States must monitor that the regulations are correctly implemented. Fiscally, the correct amount of funds must be set aside from the correct stream of federal funds; the funds must be used for allowable activities and on allowable groups of children; and the funds must supplement and not supplant existing activities or initiatives. Many states work with LEAs to evaluate their progress. Often this is through an evaluation plan. This is not required by regulation but is key to ensuring that these innovative uses of federal special education dollars address the needs they are designed to

address. This set of rubrics was developed to support states in carrying out their oversight responsibilities.

While there is no specific IDEA requirement to create LEA plans to budget for and implement activities, states must oversee LEA implementation of both CEIS and CCEIS. For this reason, most states require LEAs to submit a budget and activities plan for C/CEIS. States may use the following rubrics to review plans for approval or provide feedback to the LEA, to monitor LEA implementation, or to train LEAs on the requirements based on regulation and best practice. LEAs can use them as self-assessments for plan development.

Rubric Layout

The two rubrics—one for each CEIS type—are similarly organized, with prompt questions down the first column and rating options across the next three columns. The two rubrics share a similar set of questions, differing where the requirements specific to C/CEIS differ. The questions are meant to ensure that the LEA has appropriately: identified the grant award year from which the funds will be used, identified the amount of funds to be used, linked the funding to contributing factors or areas of need, identified the groups of children to be served, supplemented and not supplanted other funding streams, followed federal and state guidance for

appropriate use of funds, and planned for required data collections and for evaluation of the C/CEIS activities. Users with questions about rubric content should refer to the related content in Section 1 for additional detail.

State personnel can customize these rubrics as needed based on state policy and procedures. Customization may be needed, for example, when states have a required state data collection system for collecting student data. In that circumstance, a state may want to remove or edit the item in the rubric.

Rubric for Reviewing CCEIS Plans

The rubric for CCEIS asks questions and assesses the degree to which they are answered or addressed in accordance with regulations or best practices. Users of the rubric should review each question and determine whether the information provided is adequate and in accordance with requirements and rate the plan accordingly. The rubric rating for each row moves from inadequate information or not meeting the requirement to some information provided to full information provided to determine whether the requirements are being met. Select the level of implementation checkbox for each question as appropriate. The state may note any concerns, comments, or feedback they would like to provide to the LEA in the last column.

| CCEIS questions | Inadequate information provided or requirement not met | Minimal information provided | Complete information provided | Level of implementation | State comments |
|---|---|--|---|---|----------------|
| Has the LEA identified the subgrant award (both year and type) from which the funds will be used and appropriately planned the timing of its spending? | The LEA did not identify the subgrant award from which the funds will be used. OR The LEA identified a subgrant award that is not available for this purpose. | The LEA identified an appropriate subgrant award from which the funds would be used but did not itemize when the funds would be obligated and liquidated, or the itemization is not in line with the availability of the subgrant. | The LEA clearly identified an appropriate subgrant award and itemized when the funds would be obligated and liquidated. The itemization is in line with the availability of the subgrant. | <input type="checkbox"/> Not Met <input type="checkbox"/> Minimal <input type="checkbox"/> Complete | |
| Has exactly 15% of total IDEA Section 611 and Section 619 funds been budgeted? | The LEA did not provide a budget to reserve 15% of their total IDEA Section 611 and Section 619 funds for CCEIS. | The LEA provided a budget for CCEIS to obligate but not for the required 15% of their total IDEA Section 611 and Section 619 funds. | The LEA provided a budget that clearly itemized how exactly 15% of their total IDEA Section 611 and Section 619 funds would be expended for CCEIS. | <input type="checkbox"/> Not Met <input type="checkbox"/> Minimal <input type="checkbox"/> Complete | |

| CCEIS questions | Inadequate information provided or requirement not met | Minimal information provided | Complete information provided | Level of implementation | State comments |
|---|---|--|---|--|----------------|
| <p>Do all planned and budgeted activities identify or address the factors contributing to the significant disproportionality?</p> | <p>The LEA did not plan or budget to identify or address the factors contributing to its significant disproportionality.</p> | <p>Some but not all planned and budgeted activities are linked to LEA-identified factors contributing to the significant disproportionality, or the budget includes planning activities to identify the factors and activities that will be defined and budgeted subsequently.</p> | <p>The LEA has clearly linked all planned and budgeted activities to LEA-identified factors contributing to the significant disproportionality.</p> | <p><input type="checkbox"/> Not Met <input type="checkbox"/> Minimal <input type="checkbox"/> Complete</p> | |
| <p>Have funds been allocated to support targeted groups of children and youth in accordance with regulations?</p> <p>Children and youth aged 3 to grade 12</p> <p>Particularly, but not exclusively, children and youth in those racial/ethnic groups that were significantly overidentified</p> <p>Children and youth with or without disabilities but not exclusively children and youth with disabilities</p> | <p>The LEA did not identify the students who will receive CCEIS, or the LEA's targeted groups are not allowable under IDEA.</p> | <p>The LEA identified groups of students who will receive CCEIS; however, they do not clearly describe all criteria (e.g., grade/age, race/ethnicity, special education status, needs, school, grade level).</p> | <p>The LEA identified targeted groups of students, clearly describing all criteria in accordance with regulations.</p> | <p><input type="checkbox"/> Not Met <input type="checkbox"/> Minimal <input type="checkbox"/> Complete</p> | |

| CCEIS questions | Inadequate information provided or requirement not met | Minimal information provided | Complete information provided | Level of implementation | State comments |
|--|--|---|--|--|----------------|
| <p>Do the CCEIS funds budgeted for the planned activities supplement and not supplant other funds (state, local, federal) previously used for the initiatives and activities?</p> | <p>The LEA did not provide any information to determine the following:</p> <ul style="list-style-type: none"> • what activities are funded with CCEIS funds; • if the CCEIS-funded activities are new or expansions of current activities; or • if the LEA is using the CCEIS funds for activities that are already in existence. | <p>The LEA did not provide enough information to accurately determine one or more of the following:</p> <ul style="list-style-type: none"> • what activities are funded with CCEIS funds; • if the CCEIS-funded activities are new or expansions of current activities; or • if the LEA is using the CCEIS funds for activities that are already in existence. | <p>The LEA provided enough information to determine that the CCEIS activities are new or an expansion of existing initiatives/activities and clarified how CCEIS resources are planned to supplement and not supplant other resources.</p> | <p><input type="checkbox"/> Not Met <input type="checkbox"/> Minimal <input type="checkbox"/> Complete</p> | |
| <p>Did the LEA document appropriate use of CCEIS funds according to federal (Uniform Grant Guidance and IDEA) and state regulations?</p> | <p>The LEA did not document appropriate use of the funds.</p> | <p>The LEA documented appropriate use of the funds for some but not all of the activities.</p> | <p>The LEA documented appropriate use of the funds for all activities.</p> | <p><input type="checkbox"/> Not Met <input type="checkbox"/> Minimal <input type="checkbox"/> Complete</p> | |
| <p>Does the LEA have a process for collecting required CCEIS fiscal and child data and reporting it to the state?</p> | <p>The LEA did not submit a plan for data collection and reporting.</p> | <p>The LEA submitted a plan for collecting and reporting of some of the required data elements, but not all.</p> | <p>The LEA submitted a plan for collecting and reporting all required CCEIS fiscal and child data.</p> | <p><input type="checkbox"/> Not Met <input type="checkbox"/> Minimal <input type="checkbox"/> Complete</p> | |

| CCEIS questions | Inadequate information provided or requirement not met | Minimal information provided | Complete information provided | Level of implementation | State comments |
|---|--|---|---|--|----------------|
| <p>Does the LEA’s plan include steps for evaluating the progress of the proposed activities toward resolving the factors contributing to the significant disproportionality?</p> | <p>The LEA plan did not include steps for evaluating the progress.</p> | <p>The LEA plan included steps for evaluating the progress on some of the activities.</p> | <p>The LEA plan included a plan for evaluating the progress on all initiatives/activities and its impact on resolving significant disproportionality.</p> | <p><input type="checkbox"/> Not Met <input type="checkbox"/> Minimal <input type="checkbox"/> Complete</p> | |

Rubric for Reviewing CEIS Plans:

The rubric for CEIS asks questions and assesses the degree to which they are answered or addressed in accordance with regulations or best practices. Users of the rubric should review each question and determine whether the information provided is adequate and in accordance with requirements and rate the plan accordingly. The rubric rating for each row moves from inadequate information or not meeting the requirement to some information provided to full information provided to determine whether the requirements are being met. Select the level of implementation checkbox for each question as appropriate. The state may note any concerns, comments, or feedback they would like to provide to the LEA in the last column.

| CEIS questions | Inadequate information provided or requirement not met | Minimal information provided | Complete information provided | Level of implementation | State comments |
|---|--|--|--|--|----------------|
| <p>Has the LEA identified the subgrant award from which the funds will be used and appropriately planned the timing of its spending?</p> | <p>The LEA did not identify the subgrant from which the funds will be used.</p> <p>OR</p> <p>The LEA identified a subgrant award that is not available for the upcoming fiscal year.</p> | <p>The LEA identified the subgrant award from which the funds would be used but did not itemize when the funds would be obligated and liquidated, or the itemization is not in line with the availability of the subgrant.</p> | <p>The LEA clearly identified an appropriate subgrant and itemized when the funds would be obligated and liquidated. The itemization is in line with the availability of the subgrant.</p> | <p><input type="checkbox"/> Not Met</p> <p><input type="checkbox"/> Minimal</p> <p><input type="checkbox"/> Complete</p> | |
| <p>Have appropriate amounts of funds (up to 15% of total IDEA Section 611 and Section 619 funds) been budgeted for CEIS?</p> <p>(note: LEAs also taking the MOE adjustment are subject to limitations on the amount reserved.)</p> | <p>The LEA did not provide a budget to use up to 15% of their total IDEA Section 611 and Section 619 funds for CEIS.</p> | <p>The LEA provided a budget for CEIS, with activities to obligate up to 15% of their total IDEA Section 611 and Section 619 funds.</p> | <p>The LEA provided a budget that clearly itemized how up to 15% of their total IDEA Section 611 and Section 619 funds would be expended for CEIS.</p> | <p><input type="checkbox"/> Not Met</p> <p><input type="checkbox"/> Minimal</p> <p><input type="checkbox"/> Complete</p> | |

| CEIS questions | Inadequate information provided or requirement not met | Minimal information provided | Complete information provided | Level of implementation | State comments |
|--|--|--|--|--|----------------|
| <p>Are the planned and budgeted activities clearly linked to the areas of need?</p> | <p>The planned and budgeted activities are not explicitly linked to identified needs for additional academic and behavioral support.</p> | <p>Some but not all of the LEA's planned and budgeted activities are explicitly linked to identified needs for additional academic and behavioral support.</p> | <p>All of the LEA's planned and budgeted activities clearly show the linkage to a need for additional academic and behavioral support.</p> | <p><input type="checkbox"/> Not Met <input type="checkbox"/> Minimal <input type="checkbox"/> Complete</p> | |
| <p>Have funds been allocated to support targeted groups of students in accordance with the requirements?</p> <p>Students in kindergarten through grade 12 (emphasis on K–3)</p> <p>Students not yet identified as needing special education and related services but in need of additional academic or behavioral support to be successful in general education</p> | <p>The LEA did not identify the students who will receive CEIS, or the LEA's targeted groups are not allowable under IDEA.</p> | <p>The LEA identified groups of students who will receive CEIS; however, they do not clearly describe all criteria (e.g., grade, special education status, needs).</p> | <p>The LEA identified targeted groups of students, clearly describing all criteria in accordance with regulations.</p> | <p><input type="checkbox"/> Not Met <input type="checkbox"/> Minimal <input type="checkbox"/> Complete</p> | |

| CEIS questions | Inadequate information provided or requirement not met | Minimal information provided | Complete information provided | Level of implementation | State comments |
|---|---|--|---|--|----------------|
| <p>Do the CEIS funds budgeted for the planned activities supplement and not supplant other funds (state, local, federal) previously used for the initiatives and activities?</p> | <p>The LEA did not provide enough information to know the following:</p> <ul style="list-style-type: none"> • what activities are funded with CEIS funds; • if the CEIS-funded activities are new or expansions of current activities; or • if the LEA is using the CEIS funds for activities that are already in existence. | <p>The LEA did not provide enough information to accurately determine one or more of the following:</p> <ul style="list-style-type: none"> • what activities are funded with CEIS funds; • if the CEIS-funded activities are new or expansions of current activities; or • if the LEA is using the CEIS funds for activities that are already in existence. | <p>The LEA provided enough information to determine that the CEIS activities are new or an expansion of existing initiatives/activities and clarified how CEIS resources are used to supplement and not supplant other resources.</p> | <p><input type="checkbox"/> Not Met</p> <p><input type="checkbox"/> Minimal</p> <p><input type="checkbox"/> Complete</p> | |
| <p>Did the LEA document appropriate use of CEIS funds according to federal (Uniform Grant Guidance and IDEA) and state regulations?</p> | <p>The LEA did not document appropriate use of the funds.</p> | <p>The LEA documented appropriate use of the funds for some but not all of the activities.</p> | <p>The LEA documented appropriate use of the funds for all activities.</p> | <p><input type="checkbox"/> Not Met</p> <p><input type="checkbox"/> Minimal</p> <p><input type="checkbox"/> Complete</p> | |
| <p>Does the LEA have a process for collecting required CEIS fiscal and student data and reporting it to the state?</p> | <p>The LEA did not submit a plan for data collection and reporting.</p> | <p>The LEA submitted a plan for collecting and reporting data for some but not all of the required data elements.</p> | <p>The LEA submitted a plan for collecting and reporting all required CEIS fiscal and student data to meet the requirements.</p> | <p><input type="checkbox"/> Not Met</p> <p><input type="checkbox"/> Minimal</p> <p><input type="checkbox"/> Complete</p> | |

| CEIS questions | Inadequate information provided or requirement not met | Minimal information provided | Complete information provided | Level of implementation | State comments |
|---|--|---|---|--|----------------|
| <p>Does the LEA’s plan include steps for evaluating the progress of the proposed activities toward addressing the areas of need?</p> | <p>The LEA plan did not include steps for evaluating the progress.</p> | <p>The LEA plan included steps for evaluating the progress on some of the activities.</p> | <p>The LEA plan submitted included a plan for evaluating the progress on all initiatives/activities and the impact on the need being addressed.</p> | <p><input type="checkbox"/> Not Met <input type="checkbox"/> Minimal <input type="checkbox"/> Complete</p> | |

Summary

This guide describes the IDEA requirements for CCEIS and CEIS at a high level and provides scenarios to show what may or may not be allowable activities or costs associated with C/CEIS. Rubrics are provided to guide LEA use of CCEIS and CEIS funds to ensure compliance with IDEA. Using the resources provided with this guide, states can support, evaluate, and monitor LEAs' proper planning for and use of IDEA C/CEIS funds; identify targeted areas that need additional training or technical assistance in implementation of the regulations for CCEIS or CEIS; share rubrics with LEAs to guide their development of C/CEIS plans; and develop a state resource document for C/CEIS.

RESOURCES

Federal Resources

- [Electronic Code of Federal Regulations \(eCFR\)](#)
- [EMAPS User Guide: IDEA Part B MOE Reduction and CEIS](#)
- [OSEP QA 23-01: State General Supervision Responsibilities Under Parts B and C of the IDEA: Monitoring, Technical Assistance, and Enforcement](#)
- [Significant Disproportionality \(Equity in IDEA\) Essential Questions and Answers](#)
- [Significant Disproportionality Final Rule with public comments and OSEP responses](#)

TA Center–Developed Resources

- [A Comparison of Mandatory Comprehensive Coordinated Early Intervening Services \(CCEIS\) and Voluntary Coordinated Early Intervening Services \(CEIS\)](#)
- [Calculating Local Educational Agency Maintenance of Effort Adjustment and Use of Freed-Up Funds](#)
- [Coordinated Early Intervening Services \(CEIS\) Resources: Step by Step](#)
- [Maintenance of Effort \(MOE\) Reduction Eligibility Decision Tree](#)
- [Quick Reference Guide on Coordinated Early Intervening Services](#)
- [SEA and LEA Edit Check and Data Display Tools - Part B MOE and CEIS](#)
- [Success Gaps Toolkit](#)
- [Understanding the IDEA Part B State Grant Funding Cycle and Different Fiscal Years](#)

FOR ADDITIONAL RESOURCES AND INFORMATION, WE INVITE YOU TO VISIT THE TA CENTERS THAT COLLABORATED IN THE DEVELOPMENT OF THIS PRODUCT:

- Center for IDEA Fiscal Reporting ([CIFR](#))
- Data Center for Addressing Significant Disproportionality ([DCASD](#))
- IDEA Data Center ([IDC](#))
- National Center for Systemic Improvement ([NCSI](#))



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