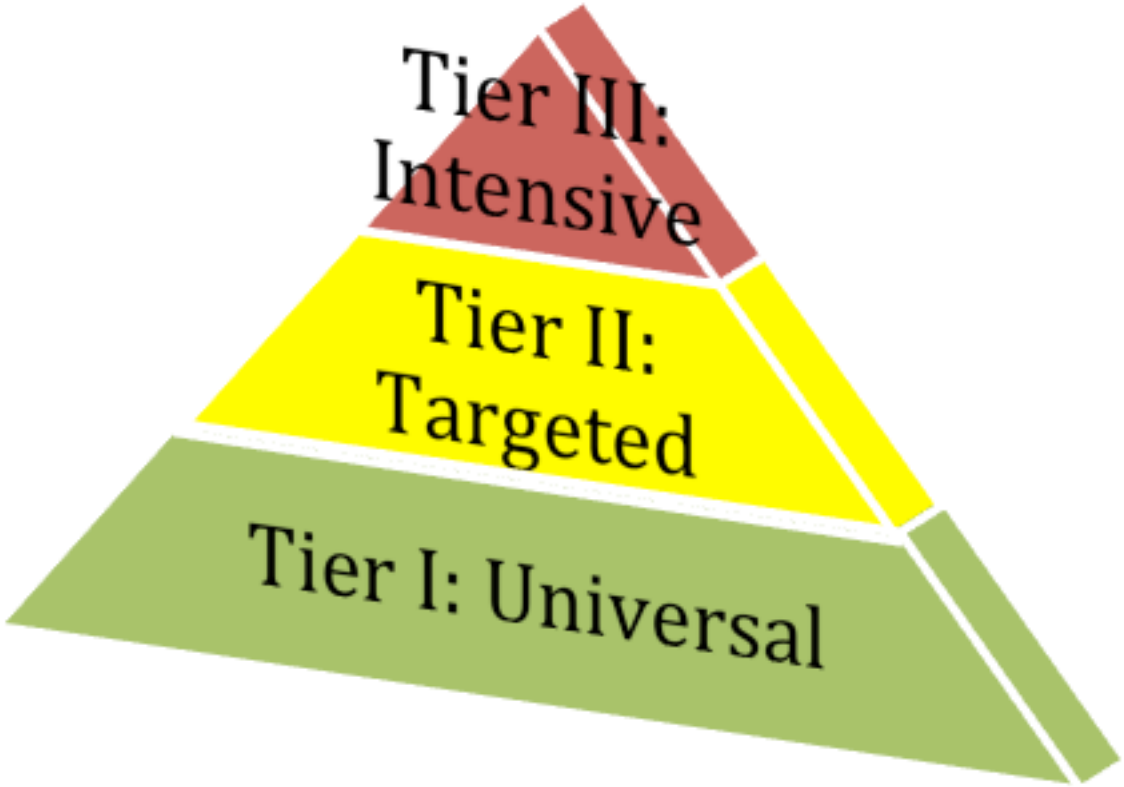
DESE FEDERAL Tiered Monitoring System



DESE Federal Tiered Monitoring System (Cyclical)

- Purpose—provide a comprehensive Tiered Monitoring profile for each district
  - One basic process for all federal Monitoring
  - One location for all federal grant monitoring and Audit uploads
  - One documentation repository for all federal Monitoring
  - One location to track Corrective Action Plan (CAP)

Goals of Federal Tiered Monitoring

- The short-term goal is to consolidate all federal monitoring into a process that will allow a comprehensive LEA Tiered Monitoring profile to be created.
- Over time, this will be used to track trend data and assist the Department in identifying areas where technical assistance may be needed.

DESE Federal Tiered Monitoring System (Cyclical)

- Conducted on a three-year cycle.
- All agencies monitored for federal programs are divided into three cohorts.
- One third of agencies are monitored each year.
- Include all federal programs within the Department with monitoring responsibilities

Federal Tiered Monitoring Cohorts

- Cohort 1 =Total 201
  - K-12= 146
  - K-8 = 25
  - Charters=9
  - State Agencies= 2
  - Other=19

- Cohort 2 = Total 207

  K-12=147
  - K-8= 28
  - Charter=18
  - State Agencies=1
  - Other=13

- Cohort 3 =Total 210
  - K-12=155
  - K-8 = 19
  - Charter =15
  - State Agencies=3
  - Other=18

- Total LEAs/Agencies/Programs Monitored by Federal Programs=618
  - K-12=448
  - K-8=72
  - Charter=42
  - State Agencies=6
  - Other=50

Federal Programs included in Tiered Monitoring

- IDEA Part B
- Title I
- Perkins
- Financial
- Title II
- 21st Century Community Learning Center—Afterschool grant
- School Age Community –Afterschool grant
- Title I.C, Title III Immigrant, Title III LEP Program
- McKinney Vento Homeless
- School Improvement g (SIG) Program
- Special Education Finance
- Charter Schools
- Perkins Secondary Grant
- Perkins Postsecondary Grant
- Adult Education and Literacy
- NCLB Consolidated Title I.A, School Improvement 1003 (a), Title I.D, Title II.A, Title VI Program
- NCLB Consolidated Title I.A, School Improvement 1003 (a), School Improvement (g) SIG, Title I.C, Title I.D, Title II.A, Title III Immigrant, Title III LEP, Title VI Fiscal

One System for All Federal Monitoring

- All monitoring is under one link (IMACs).
- Same look and feel for all monitoring
- Activity due dates displayed on home screen.
- Comprehensive view of monitoring for all programs being monitored district-wide
- Ability to upload documentation or web links as evidence of compliance
- All monitoring communication with the Department conducted through the same system
- All monitoring reports archived in one system

One Location for Corrective Action Plan tracking (CAP)

- Corrective Action tracking, conversations, and follow-up documentation located in one place.
- Ability to visually indicate when a Corrective Action is complete
- Reporting/Corrective Action (CA)
  - The Department will work with the LEA to assist with the correction of noncompliance
- Historical record of Corrective Actions and follow-up documentation

All Federal Monitoring will follow same basic process

- Desk Audit –all LEAs annually
  - Conducted by the Department based on existing data
- Self-assessment – Required for all LEAs in a designated cohort
  - Conducted by LEA
- Desk Monitoring – Review/Verification of Self-assessment
  - Conducted by the Department
- Reporting and/or Corrective Action Plan (CAP)
  - The Department will work with the LEA to assist with correction of noncompliance
- Onsite/phone Review – select LEAs based on established risk factors for each program

Federal Tiered Monitoring—District onsite selection for 2015-16

CDCode	SCHOOL	FINANCE	SPED FINANCE	NCLB	SPEC ED	EXTEND LEARN	PERKINS	SIG	TITLE III/MIG	COUNT	MONTH
		Pat or Jen	Angie Leslie	Julie	Betty/Karen	Cindy	Andy	Craig	Shawn		
048078	KANSAS CITY 33	O	O		O		O	O	O	6	NOV
048077	INDEPENDENCE	O	O		O	O	O		O	6	FEB
115906	CONFLUENCE ACADEMIES	O	O	O			O		P	4	DEC
096109	NORMANDY	O				O	O		P	3	OCT
073108	NEOSHO R-V	O				O			O	3	MAR
049148	JOPLIN SCHOOLS		O		O		O		P	3	DEC
035097	CLARKTON C-4	O	O	O					P	3	NOV
026006	JEFFERSON CITY	O	O				O		P	3	JAN
024090	LIBERTY 53	O		O					O	3	FEB
012109	POPLAR BLUFF				O	O	O			3	MAR
005128	MONETT R-I		O			O			O	3	OCT
107158	RAYMONDVILLE R-VII	O		O						2	Finance - Dec 15-16
106001	BRADELYVILLE R-I	O		O						2	Finance - Dec 4
097119	MALTA BEND R-V	O	O							2	
096101	BRENTWOOD	O		O						2	
096094	MEHLVILLE R-IX				O				O	2	JAN?
082100	BOWLING GREEN R-I		O	O						2	
081096	ROLLA 31		O				O		P	2	
079078	ALTENBURG #48		O	O		P				3	
070093	MONTGOMERY CO R-II	O		O					P	2	
051154	JOHNSON CO R-VII	O				O				2	
049144	WEBB CITY R-VII		O						O	1	
048909	ALLEN VILLAGE		O						O	1	
039135	ASH GROVE R-IV	O		O						2	
037037	GASCONADE CO. R-II		O	O						2	
024093	NORTH KANSAS CITY 74	O							O	1	
008106	LINCOLN R-II		O	O						2	
005124	PURDY R-II			O					O	1	
999361	BOYS & GIRLS CLUB OF OZARKS					O				1	
999020	BOYS & GIRLS CLUB OF POPLAR BLUFF					O				1	
200200	THREE RIVERS COMMUNITY COLLEGE						O			1	
126126	STATE FAIR COMMUNITY COLLEGE						O			1	
115115	ST. LOUIS CITY					O				1	
112102	MARSHFIELD						O			1	
112101	FORDLAND R-III			O						1	
111087	CLEARWATER R-I			O						1	
104043	CRANE R-III			O						1	
104041	HURLEY R-I			O						1	
103131	BLOOMFIELD R-XIV			O						1	
096111	RIVERVIEW GARDENS							O		1	
096103	HANCOCK PLACE			O					P	1	
092088	FRANCIS HOWELL R-III		O						P	1	

Special Education Compliance Monitoring

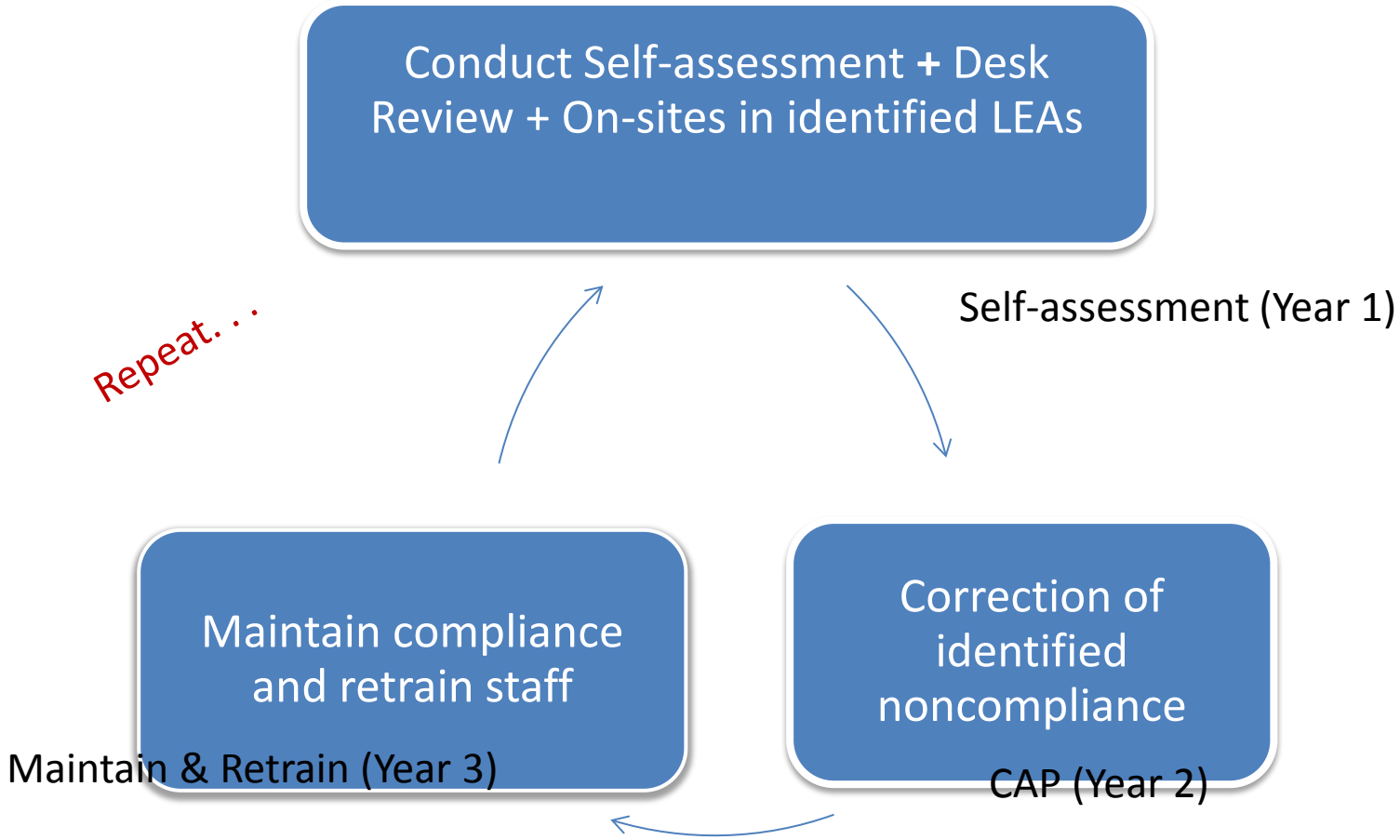
Compliance Monitoring

- ANNUAL (All LEAs, every year)
  - Disproportionate Representation (SPP 9 & 10)
  - Discipline (SPP 4A/B)
  - Significant Disproportionality
  - Coordinated Early Intervening Services (CEIS)
  - Determinations (Includes Results Indicators)
  - Desk Audit
- CYCLICAL
  - Federal Tiered Monitoring

The Basics…..

- The basics of our cyclical monitoring system are:
  - Selection process/risk assessment
  - Desk audits
  - On-site monitoring
  - Compliance results
  - Follow-up & improvement planning

Special Education Compliance Monitoring Process



Self-Assessment--Year 1

Surveys of all parents of SPED students during the school year (SPP I-8)

Self-monitor for HQT – Oct. - April

Training for Self-Assessment - **Oct**

↓

Conduct Self-Assessment - **Nov-Jan**

↓

Submit Self-Assessment in IMACS - **Feb 1**

↓

Submit Verification Documentation for the Desk Review - **Apr 1**

↓

Submit Timelines Data (Initial Eval/C to B Transition) - **May 15**

Corrective Action Plans-- Year 2

Watch CAP Year Webinar / Receive SpEd Program Review Report – **mid-Sept**

Create Plan for Correction in IMACS using Rubric – **Nov 1 or sooner**

Onsite Monitoring conducted – Nov - April

Submit Documentation to Clear I-CAPs - **Dec 31 or sooner**

Submit Follow-up Timelines – **March 20 or sooner**

Submit Samples of Correction to clear CAPs and document in IMACS - **Apr 1 or sooner**

ALL noncompliance cleared within 1 year of SpEd Program Review Report

Yes

Monitoring Complete for the Cycle

No

Sanctions Determined

Maintain and Retrain--Year 3

LEA is IN compliance - Identify areas needing retraining or improvement to <u>maintain</u> compliance

Work with RPDC consultants for targeted training

Review, maintain, and/or establish policies, procedures and practices to ensure special education compliance

Trends from Monitoring Data

Where are They Now?

- **Top 10 Special Education Indicators Out of Compliance 2013-14 to 2014-15**
- **Top 10 Special Education Indicators 2012-13 to 2014-15 (Cohort 1 to Cohort 1 after 3 years)**

THEN	NOW	Indicator #	Description
#1	#5	200.800.a	Measureable post-secondary goals
#2	#3	200.820.a	Special education services
#3	#4	200.810.b	SMART Goals
#3	**#1**	200.180	**Eligibility within 60 days**
#4	#11	200.1050.a	Consent before providing initial services
#4	**#2**	200.850.d	**Program accommodations and modifications list frequency**

THEN	NOW	Indicator #	Description
#5	#15	200.850.c	Program accommodations and modifications list location
#6	#11	200.1050.a	NOA provided and consent obtained prior to providing initial services
#7	#14	200.940.a	Description of how progress will be monitored
#8	**#6**	200.200.a	**Parent provided a copy of the initial evaluation report**
#8	**#7**	200.810.e	**Goals are present for every special education service**

THEN	NOW	Indicator #	Description
#8	**#5**	200.880.a	**Description/explanation of why full participation in general education is not possible**
#8	**#7**	200.810.e	**Goals are present for every special education service**
#9	**#7**	200.610.b	**Post-secondary transition listed as purpose of meeting on the NOM**
#10	#11	200.610.a	Parent informed of all purposed of the IEP

Trends and Implications . . .

- From 2013-14 to the 2014-15 school year
  - 67% of the TOP 10 Indicators school year were in the list again during

TOP 10

INDICATORS OUT OF COMPLIANCE

CYCLE 1 TO CYCLE 2 COMPARISON FOR COHORT 1

INDICATOR	DESCRIPTION	% for CYCLE 1 2011-12 SY	% CYCLE 2 2014-15 SY	CYCLE 1 TO CYCLE 2 TREND
200.180	Eligibility staffing held within required timelines	20%	20%	⟷
200.850.d	Program modifications and accommodations in the IEP state frequency of how often they will occur (i.e. – daily, weekly, monthly)	24%	19%	↓
200.820.a	Specific Special Education Services	N/A	15%	New in 2013-14
1400.50.b	Each team member certifies in writing whether the evaluation report reflects agreement with the eligibility for a specific learning disability	N/A	13%	New in 2014-15
200.810.b	Measurable annual goals are written in terms that are SMART: Specific to the skill or behavior to be achieved, measurable, attainable, results-oriented, time-bound	13%	13%	⟷
200.800.a	Measurable postsecondary goals	45%	12%	↓
200.880.a	Description of the extent to which the student will not participate in regular education environment and why	N/A	12%	New in 2013-14
200.200	Parent is provided a copy of the evaluation report	7%	11%	↑
200.610.b.	Beginning not later than the first IEP to be in effect when the child is 16, Notification of Meeting states postsecondary transition is a purpose of the meeting	N/A	10%	New in 2013-14
200.810.e.	IEP goals present for each special education and related service	13%	10%	↓
200.90.a	The NOA for evaluation includes a description of the areas of functioning to be assessed	N/A	9.5	New in 2014-15
200.90.b	The NOA for evaluation includes a description of the areas of functioning to be assessed	N/A	9.0%	New in 2014-15
200.220.a	Documentation of the required observation for ED, Autism, and SLD, in the initial evaluation report	N/A	8%	New in 2014-15
200.480.a	Documentation of the required observation for ED, Autism, and SLD, in the reevaluation evaluation report	N/A	9.5%	New in 2014-15

The GOOD News. . .

- Three Years Ago. . .
  - **45%** of LEAs were **out** of compliance on the #1 indicator
- Today. . .
  - **20%** of LEAs are **out** of compliance on the #1 indicator

Almost 1/2 of LEAs were out 3 years ago and only 1/5 are out now . . .This means fewer LEAs in Cohort 1 are out of compliance overall!

Onsite Monitoring Activities

- Selected buildings for review based on data
- Verification through file reviews, interviews and classroom student observations
- Areas of focus are:
  - Provision of IEP Services
  - Least Restrictive Environment
  - ECSE
  - Discipline procedures for SWD
  - Paraprofessional training
  - HQT for special educators

Department of Elementary and Secondary Education
Special Education

RISK FACTORS FOR ONSITE REVIEWS 2015-16
8/17/2015

MAP-A Participation: X indicates the district had 2013-14 Comm Arts MAP-A proficient greater than 1% of accountable
MAP Accommodations: Not reviewed
Timely Accurate Data: X indicates that district lost one or more credits for timely data for either 2013-14 or 2014-15 (to date) data submissions
HQT: X indicates that the district had less than 100% of special education teachers (PK-12) Highly Qualified for 2014-15
Incidence Rate: X indicates that the district's incidence rate was greater than 14% for 2014-15
Placements: X indicates the district was below 46% for two years for Inside Regular > 79% and/or above 12.2% for two years for Inside Regular < 40%
Self-assessment results: Reviewed, but not sure what criteria was
Determination: X indicates the district was "Needs Assistance"
Dispute Resolution: X indicates the district had findings of noncompliance from child complaints during 2014-15
Speech Implementer: X indicates the district had at least one approved speech implementer for in 2015-16
C to B Transition: X indicates the district reported at least one child in IMACS for C to B transition in 2014-15 self-assessment
JDC: X indicates that there is a juvenile justice center in the district

Risk	Districts
0	19
1	56
2	61
3	22
4	14
5	3
6	2

C/D	District	Cohort Year	RPDC	Enr Group	K-8	Prior Onsite	14-15 Enrollment	MAP-A Part	MAP Accom	Timely Accurate Data	HQT	Incidence Rate	Placements	Self-Assess Results	Determination	Dispute Resolution	Speech Implementer	C to B transition reported	JDC	Count of Risk Factors
								54		5	43	75	22	17	1	9	24	72	5	
		2015-16	7	2		12-13	7674	X			X	X				X		X	X	6
		2015-16	3	2		12-13	14228	X			X		X			X		X	X	6
		2015-16	5	6			652	X			X					X	X	X		5
		2015-16	2	2		09-10 T	8932	X			X					X		X	X	5
		2015-16	6	5			1168	X			X	X					X	X		5
		2015-16	9	5			831	X				X					X	X		4
		2015-16	6	4		07-08 E&T	1517	X			X	X	X							4
		2015-16	3	2		12-13	14308				X		X	x				X		4
		2015-16	8	2			10514				X	X				X		X		4
		2015-16	1	2		12-13	5080	X			X	X						X		4
		2015-16	1	5			798	X			X	X						X		4
		2015-16	6	5			927	X				X		x				X		4
		2015-16	3	3			4965	X					X					X		3
		2015-16	1	9	Y		90	X			X	X						X		4
		2015-16	6	9	Y		127	X		X		X		x						4
		2015-16	5	9			125	X		X							X	X		4
		2015-16	2	7			302	X				X	X					X		4
		2015-16	9	7			264	X			X	X						X		4
		2015-16	9	8			199	X		X		X		x						4
		2015-16	5	8			166				X	X		x				X		4
		2015-16	6	6			665					X	X				X			3
		2015-16	4	5			1280				X			x				X		3
		2015-16	7	8			220				X	X	X							3
		2015-16	1	5		07-08 E&T	1100	X			X		X							3
		2015-16	8	1			16959							x		X		X		3
		2015-16	6	9	Y		122	X				X		x						3
		2015-16	2	4			1840				X		X				X			3
		2015-16	1	7			268	X				X						X		3
		2015-16	9	9			132	X			X	X								3
		2015-16	3	2			11770				X							X	X	3

Data, Data, Data…..

- We use data in our monitoring process in this manner:
  - Verify compliance
  - Select on-sites
  - Customize on-site reviews
  - Identify districts for targeted technical assistance
  - Identify common areas of needed improvement statewide

Cross-Division

- Coordinated Monitoring of Federal Programs
- Development of Federal Program Profiles
  - Commonalities
    - Lead to professional development and training
    - technical assistance