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| Logo: The Early Childhood Technical Assistance Center (ECTA) | Logo: The Center for IDEA Early Childhood Data Systems (DaSy) |

Part C General Supervision Monitoring Procedures Checklist

*For more information, visit* [*https://ectacenter.org/topics/gensup/partc-general-supervision-monitoring-procedures-checklist.asp*](https://ectacenter.org/topics/gensup/partc-general-supervision-monitoring-procedures-checklist.asp)

A [lead agency](https://ectacenter.org/partc/ptclead.asp)'s general supervision system is the mechanism for enforcing federal requirements and for ensuring continuous improvement. This information might be described in one or more state manuals, documents or tools. This checklist can be used:

* to assess whether or not the lead agency's current procedures include the necessary elements to effectively monitor the implementation of the IDEA;
* to help evaluate, prioritize, or improve specific parts of the general supervision system;
* in preparation for participation in the [Differentiated Monitoring and Support (DMS 2.0)](https://ectacenter.org/topics/gensup/dms.asp) process; and
* in tandem with the [Accountability and Quality Improvement Component](https://ectacenter.org/sysframe/component-accountability.asp) of the [System Framework](https://ectacenter.org/sysframe).

[](https://ectacenter.org/topics/gensup/partc-general-supervision-monitoring-procedures-checklist.asp)

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# Introduction

“The primary focus of the State's monitoring activities must be on —

1. Improving early intervention results and functional outcomes for all infants and toddlers with disabilities; and
2. Ensuring that EIS programs meet the program requirements under part C of the Act, with a particular emphasis on those requirements that are most closely related to improving early intervention results for infants and toddlers with disabilities.”

— [*34 CFR §303.700(b)*](https://www.ecfr.gov/current/title-34/subtitle-B/chapter-III/part-303/subpart-H/subject-group-ECFRe32b04708514b9c/section-303.700#p-303.700(b))

General supervision and monitoring activities should be designed and used to support equity by identifying and addressing disparities related to access ([child find](https://ectacenter.org/topics/earlyid/earlyid.asp), [evaluation and assessment](https://ectacenter.org/topics/earlyid/evaluation-assessment.asp), and [eligibility](https://ectacenter.org/topics/earlyid/partcelig.asp)), program experiences, and the provision of services and supports necessary to ensure positive outcomes for each and every child and family served by early intervention service (EIS) providers.

“**Early intervention service provider or EIS provider** means an entity (whether public, private, or nonprofit) or an individual that provides early intervention services under part C of the Act, whether or not the entity or individual receives Federal funds under part C of the Act, and may include, where appropriate, the lead agency and a public agency responsible for providing early intervention services to infants and toddlers with disabilities in the State under part C of the Act.”

— [*34 CFR §303.12*](https://www.ecfr.gov/current/title-34/subtitle-B/chapter-III/part-303/subpart-A/subject-group-ECFR8d7eb7e02db8abe/section-303.12)

## Data and Equity

Lead agencies are encouraged to consider equity, data-informed decision-making, and continuous improvement when developing, implementing, and revising their general supervision system.

Data-informed decision-making is an essential concept for improving results and outcomes for each and every child and their family, and ensuring compliance with IDEA requirements. Data-informed decision-making can help reduce systemic inequities, answer important questions related to equity, and ensure the EIS providers are effectively monitored and supported through correction of noncompliance and continuous improvement activities.

### Correction of Noncompliance

* [OSEP Memo 09-02 to Chief State School Officers Reporting on Correction of Noncompliance](https://sites.ed.gov/idea/idea-files/osep-memo-09-02-reporting-on-correction-of-noncompliance/) (2008)
* [Frequently Asked Questions Regarding Identifying and Correcting Noncompliance and Reporting on Correction in the State Performance Plan (SPP)/Annual Performance Report (APR)](https://sites.ed.gov/idea/idea-files/osep-memo-09-02-reporting-on-correction-of-noncompliance/) (2008)
* [A State Guide on Identifying, Correcting, and Reporting Noncompliance in Accordance with IDEA Requirements](https://ectacenter.org/~pdfs/topics/gensup/identifyingnoncompliance.pdf) (NCSI, DaSy, ECTA, IDC, 2021)

## Rating Checklist Items

For each item in the checklist:

* rate it as **included**, **under development/needs revision**, or **not included**;
* cite the **evidence**; and
* document **notes** related to the item (for example, the specific information that needs modification).

Lead agencies are encouraged to modify the rating system so that it provides the most useful information about the system’s design and function.

# I. Overview of General Supervision System

States should have an overview of how the lead agency conducts its monitoring activities under their general supervision system. This overview should briefly describe how EIS providers are selected, and how specific compliance and results areas are prioritized in response to emerging issues and performance (for example, a focused on-site visit to a particular EIS provider, or a focus on child find in response to performance).

Lead agencies should highlight how stakeholders are engaged within each process and how data are collected, analyzed, shared, and interpreted to promote inclusion, access, and equity. A brief description of how the various general supervision component connect with monitoring should be included. Content in this overview can also be helpful to lead agencies as they develop the required description of their general supervision system in the introduction of the [SPP/APR](https://ectacenter.org/partc/partcapr.asp).

This overview should briefly cover the following:

| Indicator | Included | Under Development/ Needs Revision | Not Included | Location of Evidence | Notes |
| --- | --- | --- | --- | --- | --- |
| 1. Purpose and use of lead agency general supervision/monitoring procedures |  |  |  |  |  |
| 1. Authority and role of the lead agency in supervision, monitoring, funding , interagency coordination, and other responsibilities defined in [34 CFR §303.120](https://www.ecfr.gov/current/title-34/subtitle-B/chapter-III/part-303/subpart-B/subject-group-ECFR8b0af1d9e085a1a/section-303.120) and [34 CFR §303.700](https://www.ecfr.gov/current/title-34/subtitle-B/chapter-III/part-303/subpart-H/subject-group-ECFRe32b04708514b9c/section-303.700) |  |  |  |  |  |
| 1. How the monitoring process aligns with the lead agency's mission, vision, and purpose of Part C |  |  |  |  |  |
| 1. How the monitoring process reflects and impacts the lead agency's current priorities |  |  |  |  |  |
| 1. Approach to [Results Driven Accountability (RDA)](https://sites.ed.gov/idea/state-monitoring-support/) including how both compliance and results are addressed |  |  |  |  |  |
| 1. Approach used to select and revise specific compliance and results indicators in addition to the SPP/APR indicators for monitoring |  |  |  |  |  |
| 1. Who conducts monitoring activities (for example, Part C monitoring coordinator, other lead agency staff, peers, and parents) |  |  |  |  |  |
| 1. Statement that all EIS providers, including vendors, are subject to monitoring under the general supervision system |  |  |  |  |  |
| 1. Specific monitoring activities (for example, desk audit, self- assessment, onsite review, interviews) and how they are used to complement each other |  |  |  |  |  |
| 1. Frequency of specific monitoring activities (for example, annually, every two years, or when data in a priority area warrants additional monitoring) regarding OSEP expectations that all EIS providers are monitored at least once every six years |  |  |  |  |  |
| 1. How noncompliance is identified and corrected and how results are improved and sustained over time |  |  |  |  |  |
| 1. Process used to identify and address emergent issues |  |  |  |  |  |
| 1. Monitoring process used for other state agencies who provide Part C services |  |  |  |  |  |
| 1. Role of the state ICC and other stakeholders, including families, in development and implementation of the general supervision plan |  |  |  |  |  |
| 1. How the lead agency builds the capacity and data literacy of diverse stakeholders, including families, to be included in the review and analyses of the data and the development and implementation of the general supervision plan |  |  |  |  |  |
| 1. How the professional development (PD) and technical assistance (TA) system is connected to the state's monitoring system, including how monitoring data is used to inform it |  |  |  |  |  |
| 1. How the lead agency's dispute resolution system is embedded in the monitoring process |  |  |  |  |  |
| 1. How the lead agency's fiscal monitoring is embedded in the monitoring process, including how [Part C Fiscal Monitoring Indicators for State Lead Agencies](https://ectacenter.org/topics/finance/partcfiscalmonitoring.asp) are selected and revised over time |  |  |  |  |  |
| 1. How each of the following components of the general supervision system are connected to the monitoring system, and how data and information from these components are used for [Developing and Implementing an Effective System of General Supervision](https://www.hdc.lsuhsc.edu/docs/TIERS/resources/Effective%20General%20Supervision%20Paper_Part%20C.pdf), including:  * State Performance Plan * Dispute resolution * Fiscal * Targeted TA and PD * Data on processes and results * Policies, procedures, and effective implementation |  |  |  |  |  |

# II. The Plan

The general supervision monitoring plan should include a clear and concise description of the states' monitor procedures and how stakeholders, including families, are engaged in these activities.

The general supervision and monitoring procedures should be in sufficient detail to clearly describe the following:

1. Monitoring indicators and data elements;
2. Monitoring methods and data collection;
3. Data analysis, making conclusions regarding results and compliance; and
4. Communication, use of data for improvement and correction, and sustaining improvement.

## A. Monitoring indicators and data elements

| Indicator | Included | Under Development/ Needs Revision | Not Included | Location of Evidence | Notes |
| --- | --- | --- | --- | --- | --- |
| 1. Complete list of monitoring indicators, including those from the SPP/APR, fiscal, and additional lead agency selected results and compliance indicators |  |  |  |  |  |
| 1. Process and timelines for revising the list of indicators, including how stakeholders are involved |  |  |  |  |  |
| 1. Complete list of the data elements needed to monitor the list of indicators |  |  |  |  |  |

## B. Monitoring methods and data collection

| Indicator | Included | Under Development/ Needs Revision | Not Included | Location of Evidence | Notes |
| --- | --- | --- | --- | --- | --- |
| 1. Process for scheduling EIS providers (through focus priorities, by cycle, from dispute resolution data, risk assessment) for monitoring |  |  |  |  |  |
| 1. Strategies used to minimize bias in data collection and how they are implemented (for example, diversity of data collectors, clear standards for coding decisions, or training for consistent use of standards) |  |  |  |  |  |
| 1. How stakeholders inform the selection of tools used to collect data on each monitoring indicators, including data elements and standards for performance |  |  |  |  |  |
| 1. Methods for collecting the data (for example, data system, self-assessment, interviews, family and provider stories, observation, record review), and how they are used |  |  |  |  |  |
| 1. List of the tools including the criteria for rating each item during monitoring |  |  |  |  |  |
| 1. Timelines for data collection |  |  |  |  |  |

## C. Data analysis, making conclusions regarding results and compliance

| Indicator | Included | Under Development/ Needs Revision | Not Included | Location of Evidence | Notes |
| --- | --- | --- | --- | --- | --- |
| 1. Steps taken to minimize bias in analyses (for example, stakeholders review results, or results are verified with multiple data sources) |  |  |  |  |  |
| 1. Process for using qualitative data (for example, interviews, family and provider stories) to contextualize lived experience |  |  |  |  |  |
| 1. Process for disaggregating the data by individual and intersecting variables, including age, race, gender, disability, health disparities, community vulnerabilities and assets, family income, individual EIS providers or agencies, provider disciplines, and other data that can identify contributing factors impacting performance |  |  |  |  |  |
| 1. Timelines for analyses |  |  |  |  |  |
| 1. Process for verifying the accuracy and quality of the data including how the lead agency engages experts to ensure that data are accurate and reliable, appropriate, and ready to use for continuous improvement |  |  |  |  |  |
| 1. Additional analyses needed for compliance and program improvement to close opportunity gaps and improve results for children and families |  |  |  |  |  |
| 1. Process for analyzing, interpreting, and making conclusions about noncompliance and results, the need for correction or improvement, and closing opportunity gaps |  |  |  |  |  |
| 1. Extent to which the lead agency engages stakeholders with relevant experiences to inform conclusions regarding equitable access to and provision of necessary services to achieve desired outcomes |  |  |  |  |  |
| 1. Procedures for identifying noncompliance, including at a minimum:    * Steps to identify noncompliance through the state's monitoring system    * Steps for identifying and verifying correction when and if using pre-finding correction    * Timelines for making a written finding of noncompliance and notifying the affected public agency of that finding |  |  |  |  |  |
| 1. Procedures for making and revising the criteria for determinations on local performance |  |  |  |  |  |

## D. Communication, use of data for improvement and correction, and sustaining improvement

| Indicator | Included | Under Development/ Needs Revision | Not Included | Location of Evidence | Notes |
| --- | --- | --- | --- | --- | --- |
| 1. Methods used for public reporting of local performance to meet the 120-day timeline, including how the lead agency establishes a common language for data interpretation by the public |  |  |  |  |  |
| 1. Description of the types of dissemination products with differentiated messaging to communicate conclusions considering level of detail, technical jargon, length, and format |  |  |  |  |  |
| 1. Procedures, including timelines, for communicating conclusions (findings letter, monitoring report) |  |  |  |  |  |
| 1. Process for communicating next steps required related to correction of noncompliance and improvement |  |  |  |  |  |
| 1. Criteria for selecting subsequent data required to demonstrate correction/improvement, based on the frequency, level and extent of the noncompliance |  |  |  |  |  |
| 1. PD/TA process used to support and sustain improvement and compliance, and how PD/TA are tailored to EIS providers to increase their capacity in identifying factors contributing to performance issues |  |  |  |  |  |
| 1. State resources (for example, funding, people) allocated to the development and implementation of effective correction or improvement strategies, and how they are targeted to EIS providers based on contributing factors, performance, and identified EIS provider and population needs |  |  |  |  |  |
| 1. Process for reviewing, tracking, and documenting updated data (for example, amount and frequency), including need to review subsequent data until the EIS provider has reached 100%, to determine if the EIS provider is currently implementing IDEA requirements correctly |  |  |  |  |  |
| 1. Process for ensuring, tracking, and documenting that all individual instances of noncompliance are corrected |  |  |  |  |  |
| 1. Process and timelines for communicating written verification of correction according to federal requirements |  |  |  |  |  |
| 1. Varity of strategies (for example, TA, corrective action or improvement plans, IDEA determinations, or sanctions) used to facilitate correction of noncompliance and improve results |  |  |  |  |  |
| 1. Processes used to review statewide performance trends, including how stakeholders assist in identifying factors related to past and present inequities and gaps in services to inform necessary revisions in strategies, policies, procedures, and statewide PD/TA activities |  |  |  |  |  |
| 1. Procedures, criteria, and timelines for making annual local determinations |  |  |  |  |  |
| 1. How continuous improvement strategies are aligned with existing early childhood and education initiatives whenever appropriate |  |  |  |  |  |